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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

**ASHLEY M. GJOVIK,**  
*an individual,*

Plaintiff,

vs.

**APPLE INC.,**  
*a corporation,*

Defendant.

Case No. 3:23-CV-04597-EMC

**PLAINTIFF'S SECOND**  
**MOTION TO STRIKE**  
**DEFENDANT'S AMENDED**  
**ANSWER; REQUEST FOR**  
**PROTECTIVE ORDER**

HEARING:

Dept: Courtroom 5, 17th Fl. & Zoom

Judge: Honorable Edward M. Chen

Date: July 31 2025

Time: 1:30 PM PST

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# PLAINTIFF’S MOTION TO STRIKE MEMORANDUM OF POINTS AND AUTHORITIES

## INTRODUCTION

1. Plaintiff Ashley Gjøvik respectfully moves this Court pursuant to Federal Rule of Civil Procedure 12(f) to strike Affirmative Defenses (numbered based on the original Answer), No. 2-4, 6-11, and 14-15.

2. Rather than cure the deficiencies identified by this Court in its May 19 2025 Order (Dkt. 215), Apple’s Amended Answer contains demonstrably false factual allegations that accuse Plaintiff of wrongdoing while claiming ignorance of facts within Apple’s own knowledge and control. This systematic abuse of pleading rules waste judicial resources, enables discovery harassment, and continues the pattern of misconduct underlying Plaintiff’s claims.

3. Apple seeks to transform discovery from a fact-finding tool into a litigation shield, claiming ignorance of facts within their control to avoid stating defensible positions while simultaneously using those false claims to justify fishing expeditions into Plaintiff’s entire life history. This conduct requires immediate judicial intervention.

### I. FACTUAL BACKGROUND

4. On May 19 2025, this Court granted Gjøvik’s first motion to strike these same defenses, noting that while Apple needed to provide “*concrete allegations*,” the allegations “*need not be extensive*.” The court struck two claims without leave to amend (Def. No. 1 – failure to state a claim, and 16 – right to assert more defenses); and denied the motion to strike for three claims (Def. No. 5 – consent, 12 – statute of limitations, and 13 – due process). The court then struck eleven additional defenses, but granted Apple leave to amend (Def. No. 2-4, 6-11, 14-15). These claims were related to causation, privilege, motive, fraud, and offset of damages.<sup>1</sup>

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<sup>1</sup> Note: Plaintiff does not oppose a proper and fair calculations of damages, however Apple has repeatedly said it has no interest in settling and has already been requesting invasive discovery under these vague defenses, while concurrently ignoring the substantive elements of the case, and making comments that it has no intention to repay Gjøvik.

5. Instead of providing the requested concrete allegations, Apple responded with a pattern of false ignorance claims such as “*Apple is currently unaware of the efforts, if any, which Plaintiff took to seek alternative employment*” (Def. No. 6) and “Apple is currently unaware of the extent, if any, to which Plaintiff has received [workers compensation] payments” (Def. No. 15). Simultaneously with filing these “ignorance” claims, Apple served discovery requests seeking ten years of Plaintiff’s complete medical history, five years of all social media accounts, extensive financial records and personal information. When challenged, Apple’s counsel admitted in meet and confer that they “*don’t know what they’ll find*” in the requested discovery then proceeding to file a baseless motion requesting discovery sanctions against Gjovik. (Dkt. 219, Jun. 12 2025).

## II. LEGAL STANDARD

6. Federal Rule of Civil Procedure 12(f) permits a court to “strike from a pleading an insufficient defense or any redundant, immaterial, impertinent, or scandalous matter.” While motions to strike are generally disfavored, they are appropriate when defenses are based on false factual premises that cannot be cured through amendment.

7. An affirmative defense must provide fair notice of the factual basis for the defense. Even under liberal notice pleading standards, defenses fail when they are based on demonstrably false factual allegations or when they claim ignorance of facts within the defendant’s knowledge and control. Federal Rule 8(b) requires defendants to state in short and plain terms its defenses to each claim asserted against it and admit or deny the allegations asserted against it by an opposing party. For affirmative defenses, Rule 8(c) requires parties to affirmatively state any avoidance or affirmative defense” and specifies that each allegation must be simple, concise, and direct with no technical form required.

8. Rule 12(f) allows courts to strike from a pleading an insufficient defense or any redundant, immaterial, impertinent, or scandalous matter. Some courts hold that *Twombly*’s plausibility standard applies to affirmative defenses because boilerplate affirmative defenses would be insufficient under the *Twombly* pleading standard. These courts argue that pleading requirements are intended to ensure that an opposing party receives fair notice of the factual basis for an assertion whether in claims or defenses.

9. Federal courts have sanctioned attorneys under Rule 11 for pleading boilerplate affirmative defenses without factual support. Rule 11 requires lawyers to confirm to the best of the person's knowledge, information, and belief, formed after an inquiry reasonable under the circumstances that claims defenses and other legal contentions are warranted by existing law and factual contentions have evidentiary support. Defenses should not have conditional language (which signals to the court that the defendant does not have evidentiary support); lawyers should not assert defenses supported through experience in defending other similarly situated cases rather than facts specific to the current case; and should not file answers without a factual basis.

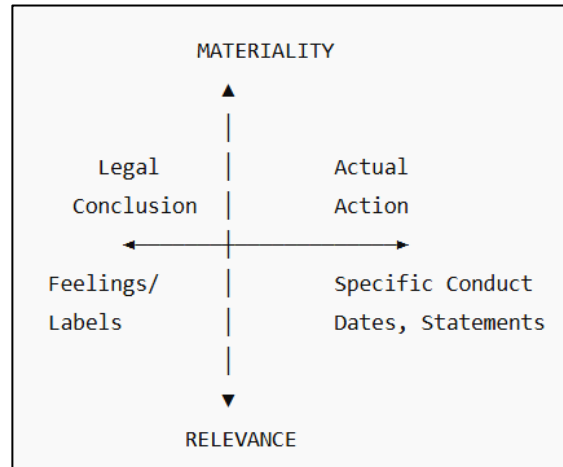
10. Defenses are insufficient when they contain only legal conclusions without facts (courts dismiss pleadings that intermingle seemingly unrelated fact and conclusory statements); when they are composed entirely of conclusions of fact and law; when courts cannot parse out which facts aligned with which legal theories; or when they fail to identify to which cause of action each defense referred (such as purely boilerplate without case-specific basis or a lack connection to specific claim).

## PUBLIC POLICY FOUNDATIONS FOR TIERED PLEADING STANDARDS

11. Under current practice, if a plaintiff accuses a defendant of fraud, they must plead with particularity under Rule 9(b). But if a defendant accuses a plaintiff of identical fraud, they need only provide "fair notice." This creates an inexplicable double standard that rewards the order of filing rather than the substance of allegations. The same factual allegation cannot simultaneously be so serious that it requires heightened pleading when made by one party, yet so trivial that conclusory allegations suffice when made by the opposing party. The nature of the allegation - not the identity of the pleader - should determine the standard.

12. Allowing defendants to make serious misconduct allegations without factual support transforms the courthouse into a forum for character assassination. Defenses become vehicles for reputational damage rather than legitimate legal arguments. Courts waste substantial

time adjudicating discovery disputes, motion practice, and ultimately trials on defenses that lack any factual foundation. Requiring specificity upfront eliminates frivolous defenses and focuses litigation on genuine disputes. Vague misconduct allegations force plaintiffs into expensive, wide-ranging discovery to disprove accusations they cannot even identify specifically. This inverts the proper burden allocation and rewards defendants for providing less information.



13. In retaliation cases, unsupported smear defenses don't just waste judicial resources - they perpetuate the very conduct that employment protection statutes prohibit. When defendants make baseless accusations of fraud, criminality, or ethical violations against whistleblowers, they effectively continue the retaliation through the court system. Courts routinely recognize that false accusations against employees can constitute standalone acts of interference with employment prospects. Allowing defendants to make such accusations in litigation filings - which become public record - without factual support creates a judicial mechanism for employment blacklisting. If employees know that reporting misconduct will result in public court filings accusing them of serious wrongdoing - regardless of factual basis - they will be deterred from exercising statutory rights. This defeats the core purpose of whistleblower protection statutes. When defenses in retaliation cases contain unsupported allegations of serious misconduct, courts should consider whether such pleading violates Rule 11 as pleading without factual basis and made for improper purpose of harassment.

14. Defendants typically have superior access to facts supporting their own defenses, particularly regarding their own motivations, decision-making processes, and compliance efforts. Requiring specificity aligns with natural information asymmetries. Vague defenses force plaintiffs to guess what they're defending against and conduct broader discovery than necessary. This inefficiency is eliminated when defendants must identify their factual basis upfront.

1           15. Plaintiffs have a due process right to understand the nature of accusations against  
 2 them, particularly when those accusations involve serious misconduct that could affect their  
 3 professional reputation and future employment. Attorneys have ethical obligations not to make  
 4 allegations without factual basis. Courts should not create pleading standards that effectively  
 5 excuse violations of professional responsibility rules. Different pleading standards for identical  
 6 allegations based solely on which party makes them violates basic equal treatment principles.

7           16. This framework doesn't create new substantive law - it simply ensures that existing  
 8 fairness principles apply consistently regardless of which party makes serious accusations against  
 9 the other.

### 10       **III. RULE 8 NOTICE PLEADING FAILURES IN RETALIATION'S** 11       **CENTRAL BATTLEGROUND**

12           17. Traditional Rule 8 analysis misses the fundamental structure of retaliation litigation.  
 13 Courts treat the employer's stated reason as just another affirmative defense deserving minimal  
 14 notice requirements. But in retaliation cases, the employer's explanation becomes the central  
 15 factual battleground that the employee must investigate and disprove to prevail. Unlike peripheral  
 16 defenses, the employer's claimed "legitimate reason" drives the entire scope of discovery,  
 17 determines expert witness needs, shapes comparative employee analysis, and controls settlement  
 18 dynamics.

19           18. The notice failure becomes apparent when examining what employees actually need  
 20 to mount a meaningful defense. To prove pretext, employees must analyze comparative treatment  
 21 of similarly situated employees - but cannot do so without knowing the specific misconduct  
 22 allegedly justifying termination. They must assess whether the employer deviated from normal  
 23 procedures, but cannot investigate procedural compliance without knowing which policies were  
 24 allegedly violated. They must examine whether the employer's stated reasons shifted over time,  
 25 but cannot track narrative changes without a baseline understanding of what the employer actually  
 26 claims happened. Current vague pleading like "performance deficiencies and policy violations"  
 27 provides no fair notice of these critical factual predicates.

28           19. This burden allocation violates basic fairness principles embedded in Rule 8.



Employers possess exclusive access to their own decision-making processes, internal communications about termination decisions, documentation supporting their stated reasons, and the timeline of their knowledge and actions. Yet current practice grants employers both superior information access and vague pleading privileges, while imposing specificity requirements and burden of proof on employees. True "fair" notice requires mutuality - if employees must provide specific notice of protected activity, knowledge, and adverse action, employers should provide specific notice of their counter-narrative.

20. The practical impact transforms retaliation litigation from focused factual disputes into expensive fishing expeditions. When employers claim "after-acquired evidence of misconduct" without specifying what misconduct, when it was discovered, what evidence supports it, or who discovered it, employees cannot prepare adequate responses. They are forced to disprove unspecified accusations while navigating discovery disputes over the scope of undefined allegations. This inefficiency serves neither judicial economy nor the truth-seeking function of litigation, while systematically advantaging the party with superior resources and information access.

#### **IV. MATERIALITY-BASED FRAMEWORK FOR STRIKING DEFENSES BUILT ON DEMONSTRABLE FALSEHOODS**

21. Courts routinely defer to the "discovery process" to sort out factual disputes, even when defendants build entire defenses on provably false statements. This abdication fails when the lie itself enables a defense that true facts would not support. Courts should apply heightened scrutiny under Rule 12(f) when: (1) the affirmative defense is material to case outcome or discovery scope; (2) the defense depends on a factual assertion that is material to its viability; and (3) that factual assertion is demonstrably false from defendant's own evidence or public records.

22. A defense predicated on a material falsehood is legally insufficient under Rule 8. "Fair notice" cannot be based on lies - it requires truthful notice. When defendants claim ignorance until "three weeks after termination" but their own evidence proves they knew beforehand, they are not providing fair notice of a legitimate defense; they are manufacturing a defense that reality does not support. Using demonstrable falsehoods to enable defenses constitutes improper purpose. In

1 the after-acquired evidence context, defendants who lie about discovery timing transform a  
 2 potential complete liability shield into a tool for harassment. The lie becomes the mechanism for  
 3 obtaining discovery rights and legal protections that the true facts would not justify.

4 23. The traditional "*let discovery sort it out*" approach fails when material lies don't just  
 5 affect trial outcomes - they expand discovery into areas that would be irrelevant under truthful  
 6 timelines. Unlike minor factual disputes, these lies can eliminate entire liability or create absolute  
 7 immunity. Courts waste substantial time managing discovery disputes based on fabricated factual  
 8 predicates. Allowing material lies in court-ordered amended pleadings signals that judicial  
 9 directives are optional.

10 24. Current practice creates perverse incentives where defendants benefit from lying  
 11 about material facts because the worst consequence is having those lies exposed during expensive  
 12 discovery. Meanwhile, truthful defendants who cannot manufacture favorable timelines or  
 13 circumstances operate at a disadvantage. In retaliation cases, this problem intensifies because false  
 14 defenses continue the pattern of misconduct that triggered the lawsuit. When defendants lie about  
 15 when they learned information to avoid liability for retaliatory termination, they use the court  
 16 system to perpetuate the very behavior employment protection statutes prohibit.

17 25. This framework does not require courts to resolve disputed facts at the pleading  
 18 stage. It requires only that courts refuse to permit defenses built on demonstrably false factual  
 19 foundations - a principle that serves judicial efficiency, truth-seeking, and fundamental fairness.

## 20 ARGUMENT

### 21 V. THESE DEFENSES REQUIRE IMMEDIATE JUDICIAL 22 INTERVENTION BECAUSE NORMAL LITIGATION PROCESSES 23 CANNOT ADDRESS SYSTEMATIC FALSE PLEADING

24 26. Apple's defenses are not merely insufficient—they are based on false factual  
 25 premises contradicted by Apple's own records. Defense 6 claims ignorance of job search efforts  
 26 when the university position is detailed in the Complaint Apple answered. Defense 8 claims Apple  
 27 "learned shortly after termination" when Apple's privilege log shows pre-termination notice.  
 28 Defense 15 claims ignorance of workers' compensation when employers necessarily participate in

the workers' compensation system. Discovery cannot cure pleadings that are contradicted by the defendant's own contemporaneous records.

27. How does Plaintiff respond to Apple's claim that they "*don't know*" about facts Apple necessarily possesses? Apple's strategy forces Plaintiff to prove negative facts about Apple's internal knowledge; waste resources on manufactured disputes about Apple's record-keeping; and defend against accusations Apple refuses to specify despite having the underlying facts. These defenses create artificial factual disputes about Apple's knowledge of their own conduct and records. The Court should not be required to manage discovery disputes and motion practice based on demonstrably false pleadings.

## VI. APPLE'S PATTERN CONSTITUTES SYSTEMATIC ABUSE OF PLEADING AND DISCOVERY RULES

### A. FALSE IGNORANCE TO AVOID RULE 11 LIABILITY

28. Apple systematically claims ignorance to avoid Rule 11's requirement for factual support, while using those same claims to justify discovery they could not otherwise obtain. Apple claims ignorance of basic employment facts to avoid Rule 11 sanctions; uses ignorance claims as discovery hooks to justify fishing expeditions, and uses "preserve rights pending discovery" to delay resolution while harassing Plaintiff.

29. Apple's discovery requests reveal their true intent—using vague affirmative defenses to justify harassment:

Apple's Pleaded "Ignorance"	Apple's Discovery Demands	Unpleaded Theory
" <i>Don't know about job search</i> "	5 years all social media	Unspecified misconduct
" <i>Don't know about workers comp</i> "	10 years medical records	Alternative causation
" <i>Learned after termination</i> "	Complete personal history	Character assassination

Dkt 220-12 (Response to Apple's Interrogatories) demonstrates the disconnect between Apple's pleaded ignorance and their demands for Plaintiff's entire life history. Plaintiff offered reasonable compromise—a neutral medical examination to verify claimed injuries. Apple rejected this legitimate approach in favor of a decade-long fishing expedition, proving harassment rather than

1 fact-finding intent.

2 **VII. PLEADING WITH PARTICULARITY REQUIRED UNDER**  
 3 **CALIFORNIA RULES AND IN FEDERAL COURT FOR**  
 4 **ACCUSATIONS OF DISHONESTY**

5 30. Where Apple’s affirmative defenses allege an act of fraud, dishonestly, malice, bad  
 6 faith, or misrepresentation by Gjovik, then *Twombly/Iqbal* should apply. For example, in Defenses  
 7 1-3, 7-10, and 13, Apple argues some variation of that Apple is not liable because Gjovik 1) made  
 8 false statements about whether or not she requested administrative leave, 2) failed to cooperate,  
 9 and 3) failed to provide accurate and complete information.

10 31. In addition, Defense 7 (unclean hands, in pari delicto, and/or after acquired  
 11 evidence) also claims that:

12 “Apple learned—shortly after Plaintiff’s employment was terminated—that  
 13 Plaintiff admitted that she disclosed confidential product-related information to a  
 14 journalist at the Verge in violation of Apple policies and her obligations under her  
 15 Intellectual Property Agreement. Moreover, in the years since Plaintiff’s  
 16 employment was terminated, Plaintiff has continued to provide inaccurate and/or  
 17 incomplete information to government entities and the public.” (Dkt 218, 43-44).

18 **B. ALLEGATIONS OF CONCEALMENT AND MISCONDUCT**

19 32. Apple’s Amended Answer accuses Gjovik of hiding her involvement in the Verge  
 20 article (“*Apple learned... that Plaintiff admitted that she disclosed...*”) despite Apple’s own evidence  
 21 showing they were aware of the article prior to publication; the publication including Gjovik’s  
 22 name, photos of Gjovik, and quotes attributed to Gjovik; and Gjovik posting contemporaneously  
 23 about her participation in the article and expanding upon her quoted commentary. If Apple has a  
 24 valid argument behind this defense, it must plead it with specificity, because otherwise it appears  
 25 to be bad faith distractions.

26 33. Apple’s defenses also generalize its claims about Gjovik “disclos[ing] confidential...  
 27 information”, failing “to cooperate,” and “failing to “provide accurate and compete information.”  
 28 All of these make some allegation of deceit or other misconduct by Gjovik, yet still fail to provide  
 the detailed factual basis for the claims. For example, in Apple’s produced evidence, an email

1 summarizing why the HR executives recommending termination Gjovik included “redacted  
2 screenshots” Apple admits this in the Amended Answer:

3 “Apple admits that one of the reasons for the termination of Plaintiff’s  
4 employment was her failure to participate in an Employee Relations  
5 investigation, including actively redacting relevant information from  
6 documents that she presented to Apple’s ER Investigator. Unless  
7 specifically admitted, Apple denies the remaining allegations of paragraph  
8 211, sentences 1 and 2. Apple admits that Plaintiff redacted portions of  
certain internal records that she posted on Twitter but denies that she fully  
redacted those records.” (Dkt 218 at 33).

9 34. Further, Apple’s statement to U.S. Dept. of Labor, and their Sept. 15 2021 email to  
10 Gjovik, also referenced comments Gjovik made complaining about Apple wanting to capture 3D  
11 scans of her ears, yet that also never shows up in the Answers at all. If Apple is still pursuing this  
12 as a defense, it needs to say so. For example, as Gjovik’s Oct. 2021 cease and desist letter to Apple  
13 stated, that information was already fully public information prior to Gjovik’s comments. (Dkt.  
14 220-6). If Gjovik needs to prepare a counter to this defense, Apple needs to plead the specific  
15 defense.

### 16 **C. ALLEGATIONS OF DISHONESTY AND PERJURY**

17 35. Apple also accuses Gjovik of making “*inaccurate and/or incomplete information to the*  
18 *government and to the public*” “*in the years since Plaintiff’s employment was terminated.*” Apple  
19 appears to be accusing Gjovik of perjury and false statements as part of her participation in state  
20 and federal proceedings, and her public activism about labor rights and the subject of her  
21 whistleblower disclosures. Taken at face value, accusations like this are accusations of fraud and  
22 requires *Twombly/Iqbal* pleading. Here, no dates, names, or events were described – only vague  
23 assertions.

24 36. Further, Apple’s defense rests on claiming that Gjovik’s complaints to the  
25 government and participation in federal proceedings is misconduct by Gjovik’s --- and that  
26 “misconduct” should provide Apple a defense on liability if they were found to have retaliated  
27 against Gjovik. By Apple claiming that Gjovik continuing to participate in the same proceedings,  
28 and continue to undertake the same type of activism, after she is terminated, is separate misconduct

1 other than the protected activity prior to the termination, even though it's the same protected  
2 activity.

3 37. Without further details provided, it appears that Apple is arguing that under the  
4 exact labor and whistleblower laws protecting Gjovik's protected disclosures and organizing,  
5 assuming Gjovik proves Apple violated those laws in their conduct toward her, that Apple believes  
6 it should not be subject to those laws and prepares to ask the court for some sort of exception. It  
7 also appears Apple is planning to request discovery on Gjovik's social media accounts (see Dkt  
8 220-12, Interrogatory Objections), communications with reporters, communications with  
9 government agencies about the charges against Apple (see 25-2028 Dkt. No. 29 with Apple  
10 demanding service of sealed communications between Gjovik and the FBI about Gjovik's  
11 allegations of criminal conduct by Apple), and communications with the public beyond social  
12 media.

13 38. This is a gross invasion of personal privacy, obstruction of justice, more violations  
14 of the Bane Act, and if the court allows this reasoning to proceed, it must demand a detailed factual  
15 basis from the defendant. Note: this probably also represents additional violations of the NLRA  
16 (most recent complaint tracked in Case No. 01-CA-365726, filed May 13 2025), Cal. Labor Code.  
17 whistleblower protections, possibly criminal law, Model Rules of Prof. Responsibility, and other  
18 ethical guidelines.

19 **D. "POLICY VIOLATIONS" AS UNSPECIFIED BREACH OF CONTRACT**  
20 **CLAIMS**

21 39. Most of Apple's Amended defenses also mention that Gjovik "*disclosed confidential*  
22 *information in violation of Apple policies and her IPA.*" Violations of contractual provisions require  
23 pleading the facts about specifically which contracts, and which provisions of the contracts were  
24 violated, which Apple still has not done.

25 40. When employers claim termination was justified by "policy violations," they are  
26 essentially asserting breach of employment contract claims that must meet basic contractual  
27 pleading requirements. Courts routinely require contract breach allegations to identify the specific  
28 contract, formation details, particular terms at issue, and specific manner of breach. Yet

1 employment courts mysteriously ignore these same specificity requirements when employers make  
2 identical breach claims disguised as "policy violation" defenses. An employer claiming "employee  
3 violated company policies" provides no more fair notice than claiming "defendant breached a  
4 contract" without identifying which contract or which terms were allegedly violated.

5 41. This pleading deficiency creates an impossible defense burden for employees.  
6 Without knowing which specific policies were allegedly violated, employees cannot prove the  
7 policy was unlawful, demonstrate the policy was not actually violated, show selective enforcement  
8 against protected class members, challenge inadequate policy formation or notice, or argue that  
9 policies were changed retroactively. The employer's vague assertion forces employees into  
10 expensive discovery just to understand the basic contours of the accusations against them,  
11 transforming what should be focused factual disputes into broad fishing expeditions.

12 42. The problem intensifies when employers simultaneously claim policy violations  
13 while refusing to provide policy copies under claims of confidentiality. This creates a fundamental  
14 contradiction - policies cannot simultaneously serve as binding obligations justifying termination  
15 and confidential documents too sensitive to share with the allegedly bound party. If policies were  
16 validly communicated to employees and formed enforceable employment terms, employees had  
17 legitimate access rights to those policies. If policies are too confidential to produce, serious  
18 questions arise about whether they were ever validly communicated or enforced, raising statute of  
19 frauds and due process concerns about their use as termination justifications.

20 43. Basic fairness requires that employers claiming policy violations meet the same  
21 specificity standards applied to other contract breach allegations. This means identifying the  
22 specific policies allegedly violated, when those policies were adopted and communicated to the  
23 employee, what specific conduct constituted the violation, and how that violation connected to the  
24 termination decision. Without such specificity, "policy violation" defenses fail to provide the fair  
25 notice required by Rule 8 and should be struck as insufficient. Courts should not permit employers  
26 to use their exclusive access to policy documents as both shield and sword - claiming violations  
27 while hiding the very policies they claim were violated.

## 28 **VIII. SPECIFIC DEFENSES ARE INDEPENDENTLY INSUFFICIENT**



1                   **AND CANNOT BE CURED**

2                   **E. DEFENSE 6 (FAILURE TO MITIGATE) - FALSE IGNORANCE OF**  
 3                   **KNOWN FACTS**

4                   44. Apple's Amended Answer said: "*Apple is currently unaware of the efforts, if any, which*  
 5                   *Plaintiff took to seek alternative employment,*" however Plaintiff's university employment was  
 6                   detailed in the Complaint (Dkt. 142 at 40-41) that Apple answered, and further, Apple's counsel  
 7                   demanded Plaintiff's removal from her contracted position as an expert witness for a law firm on a  
 8                   fraud class action, and they did remove her. Apple actively interfered with Plaintiff's mitigation  
 9                   efforts while claiming ignorance. Employers cannot claim failure to mitigate while interfering with  
 10                  mitigation efforts. Apple cannot claim ignorance of facts contained in their own case pleadings and  
 11                  caused by their own conduct.

12                  **F. DEFENSE 8 (UNCLEAN HANDS/EQUAL FAULT/AFTER-ACQUIRED**  
 13                  **EVIDENCE) - FALSE TIMELINE**

14                  45. Apple claims that "*Apple learned—shortly after Plaintiff's employment was*  
 15                  *terminated—that Plaintiff [disclosed to journalist].*" However, Apple's privilege log shows pre-  
 16                  termination notice ([Exhibit A](#)). The Verge article was published over a week before termination  
 17                  with Plaintiff's name and photos and after-acquired evidence doctrine requires lack of prior  
 18                  knowledge. Apple misapplies the after-acquired evidence doctrine while making factual allegations  
 19                  contradicted by their own contemporaneous records.

20                  46. Apple's own privilege log shows their top executives emailing about that exact Verge  
 21                  article prior to the publication of the article, her name, face, and quotes were in the article; and the  
 22                  journalist told her she specifically notified Apple of Gjovik's involvement. So Apple is making a  
 23                  false statement to the court about its knowledge, and ignoring Gjovik's very public involvement in  
 24                  the article, and instead redirecting the Sept. 15 2021 email chain, a week after Gjovik was fired,  
 25                  where Jonanna Appleseed in Apple's Legal and Global Security team, (while still an employee),  
 26                  filed a complaint against Gjovik with Apple Legal claiming Gjovik "leaked IP" and attached her  
 27                  private messages with Gjovik including photos of Gjovik's naked body taken by the Gobbler app.

28                  47. Further, as discussed prior, Apple's accusations about misconduct by filing charges



1 with the government and participating in federal proceedings, is not a defense, but an admission of  
 2 additional misconduct and extreme retaliatory animus by Apple. (Similar arguments are to be made  
 3 for complaining about her public labor, crime victims' rights, and whistleblower advocacy). It would  
 4 be contrary to public policy to allow an employer to escape liability from a whistleblower protection  
 5 and/or labor law, due to the employer admitting to resenting and/or violating that very law.

6 48. Further, here and throughout Apple mentions that Gjovik "failed to cooperate" but  
 7 does not provide any factual basis for what that failure to cooperate included. It appears to reference  
 8 Plaintiff's request to keep conversations in writing due to her open NLRB charge against the  
 9 employer, and other requests which were invoking her *Johnnie's Poultry* rights – which is protected  
 10 under federal labor law. So, if Apple admits this is what they mean, they are admitting to another  
 11 violation of the NLRA, which is why they're being evasive.

12 49. Similarly Apple does not define what Gjovik's "failure to provide complete  
 13 information" referred to, but it appears it at least includes an allegation that Gjovik "redacted"  
 14 evidence she provided to Apple HR, however as noted in her 5AC, the redacted documents they  
 15 appear to reference were actually her Twitter posts, which their privilege log admits they were  
 16 closely monitoring. The only example of redacted evidence sent directly to the HR team would be  
 17 Gjovik trying to withhold her best friend's identity from a complaint she made that she did not  
 18 even want investigated, but HR said they would investigate and then did not actually investigate,  
 19 but did tell the person (an executive in a team where the best friend worked) that Gjovik complaint.  
 20 Gjovik eventually broke down and provided the friend's name to HR to speak with since she  
 21 witnessed the encounter at issue. However, no policy violations were found, and as Gjovik had  
 22 worried, her best friend quickly left the U.S. returned to Europe, despite an in progress permanent  
 23 resident application – and her friend never talked to her again after Apple fired Gjovik. So again,  
 24 the facts behind Apple's allegations are very important and need to be disclosed if Apple pursues  
 25 these defenses.

26 50. Finally, in this defense and throughout, Apple also claims that Gjovik asked to be  
 27 put on administrative leave. Apple put Gjovik on administrative leave twice in 2021, and Apple  
 28 does not distinguish which one it is referring too. Apple also does not provide dates, times, or

1 reference documents to support its allegation.

2 51. For the sake of argument, even if Gjovik did ask to be put on leave, that would have  
3 occurred prior to her termination and would have been unrelated to Apple's allegation she leaked  
4 confidential information. Any arguments about leave would not qualify for after acquired evidence  
5 because it occurred prior to the termination, and it would not apply under unclean hands because  
6 Apple's stated defense resolves around termination issues.

7 52. This also would not support a claim of *In Pari Delicto* because Apple claims it fired  
8 Gjovik for reasons unrelated to administrative leave. The only possible explanation plaintiff can  
9 think of is Apple claiming In Pari Delicto for the 96(k) claim, saying she asked to be put on leave,  
10 so it wasn't protected personal time – but that is not the legal test for 96(k). Gjovik could have been  
11 fully at work but then made a post on Twitter on her lunch break, discussion constitutionally  
12 protected topics, and she would still be protected under 96(k).

13 **G. DEFENSE 15 (WORKERS' COMPENSATION SET-OFF) -**  
14 **IMPOSSIBLE IGNORANCE**

15 53. Apple's claimed that “*Apple is currently unaware of the extent, if any, to which Plaintiff*  
16 *has received [workers compensation] payments.*” But this is impossible because employers pay workers'  
17 compensation insurance premiums, employers receive notice of all workers' compensation claims,  
18 and Apple would necessarily know about any payments to their employee. Apple did coerce Gjovik  
19 to file a worker's comp. claim in May 2021, but then promptly denied it, and Gjovik complained  
20 that she was warned by a law school professor that Apple was probably trying to manufacture  
21 defenses if there is subsequent litigation. (See the Second Amended Complaint).

22 54. No employer can legitimately claim ignorance of workers' compensation payments  
23 to their own employees. If Apple is referencing worker's compensation payments from a later  
24 employer, then Apple again fails to mention anything about specific employers, and instead claims  
25 it has no information.

26 **IX. THESE DEFENSES SHOULD BE STRUCK WITH PREJUDICE**

27 55. Apple cannot cure these defenses because they are based on false factual premises  
28 contradicted by Apple's own records and conduct. Further amendment would be futile because

Apple cannot change the timeline showing they knew before termination (Defense 8); Apple cannot deny the university and law firm employment detailed in the Complaint they answered (Defense 6); and Apple cannot legitimately claim ignorance of their own workers' compensation system (Defense 15). Moreover, Apple's pattern of false ignorance across multiple defenses demonstrates this is not inadvertent error but deliberate litigation strategy. Allowing further amendment rewards this conduct and enables continued abuse of pleading rules.

## CONCLUSION AND REQUEST FOR RELIEF: THE CRITICAL JUNCTURE REQUIRING IMMEDIATE JUDICIAL INTERVENTION

56. These pleading deficiencies are not mere technical violations that will resolve themselves through the ordinary course of litigation. They represent fundamental failures that, if left unaddressed, will corrupt the entire proceeding and force this Court to intervene repeatedly to manage the same underlying problems while additional harm accrues to all parties.

57. The urgency stems from Defendant's strategic recognition that its prior stated defenses in administrative proceedings now constitute direct facial admissions of liability under both Tamney wrongful termination in violation of public policy and Labor Code section 1102.5. Defendant previously articulated specific reasons for Plaintiff's termination that, if maintained consistently, would establish protected activity under California's fundamental public policy protections. Most critically, Defendant's prior statements implicate Tamney's protection for employees who protest invasions of privacy based on California's constitutional right to privacy - a protection that operates regardless of the audience or recipient of such protests. If an employer terminates an employee for conduct that represents fundamental public policy concerns, the employer faces automatic liability under Tamney.

58. Defendant now finds itself legally trapped: maintaining consistency with its prior defense constitutes an admission of violating California employment protection statutes, while abandoning that defense exposes serious credibility and bad faith issues. Defendant has chosen a

1 third path - refusing to commit to any specific factual defense in its court pleadings while  
 2 maintaining the right to deploy whatever defense proves most advantageous at trial. This  
 3 gamesmanship prevents Plaintiff from moving for summary judgment on claims where Defendant's  
 4 own prior statements establish liability, artificially extending litigation that could be resolved on an  
 5 expedited basis.

6 59. If this Court requires Defendant to plead its actual factual defenses with the  
 7 specificity outlined above, the Court will expedite case resolution rather than prolonging it. Clear,  
 8 specific defenses will enable focused discovery, meaningful summary judgment practice, and  
 9 potentially significant case narrowing. Conversely, permitting continued vague pleading ensures  
 10 protracted litigation punctuated by repeated motions to compel, discovery disputes, and eventual  
 11 judicial intervention to address the same specificity failures this motion raises today.

12 60. The harm from delay extends beyond litigation efficiency. Plaintiff, as an alleged  
 13 whistleblower, continues to suffer reputational damage from unspecified accusations of serious  
 14 misconduct that remain part of the public record. Each day that vague allegations of fraud, policy  
 15 violations, and other misconduct remain unchallenged enables the continued chilling effect on  
 16 protected activity that employment protection statutes are designed to prevent.

17 61. **WHEREFORE**, Plaintiff respectfully requests that this Court grant the Motion to  
 18 Strike and order Defendant to replead its affirmative defenses in compliance with the standards  
 19 outlined herein, with the understanding that further deficient pleading may warrant sanctions  
 20 under Rule 11 for continued violation of this Court's pleading requirements.

## 21 **X. REQUEST FOR PROTECTIVE ORDER PENDING RESOLUTION OF** 22 **AFFIRMATIVE DEFENSES**

23 62. Alternatively, or in addition to striking deficient defenses, Plaintiff respectfully  
 24 requests a protective order staying discovery on issues beyond Plaintiff's prima facie case until  
 25 Defendant provides adequate factual specificity in its affirmative defenses.

26 63. Apple's interrogatories (Dkt. No. 220-12) seeking ten years of medical records and  
 27 five years of social media accounts, coupled with their admission that they "don't know what they'll  
 28 find," proves these defenses were filed to enable fishing expeditions rather than raise legitimate legal

1 theories. The Court should enter a protective order limiting discovery to facts specifically pleaded  
2 with factual support, preventing Apple from benefiting from their systematic pleading abuse.

3 64. The immediate harm from Defendant's vague pleading is already manifesting in  
4 discovery abuse. Despite pleading only conclusory defenses, Defendant has propounded discovery  
5 requests seeking ten years of Plaintiff's medical records, five years of social media records, and  
6 sweeping requests for personal information that bear no relationship to any articulated defense  
7 theory. This represents exactly the type of fishing expedition that specific pleading requirements  
8 are designed to prevent.

9 65. Defendant's refusal to specify its defenses enables unlimited discovery scope  
10 because every conceivable area of inquiry can be justified as "potentially relevant" to unspecified  
11 claims of misconduct, performance issues, or after-acquired evidence. When Defendant claims  
12 "policy violations" without identifying which policies, it can seek discovery on all policies. When  
13 Defendant claims "performance issues" without specificity, it can demand records spanning  
14 Plaintiff's entire career and personal life.

15 66. Rule 26(b)(1) requires discovery to be proportional to the case and relevant to party  
16 claims or defenses. Defendant's current discovery requests fail both tests - they are  
17 disproportionate to any defense actually pled with specificity, and their relevance cannot be  
18 assessed when the defenses themselves lack factual content. In retaliation cases, overbroad  
19 discovery serves the same chilling function as the underlying retaliatory conduct. Forcing a  
20 whistleblower to produce decades of medical records and years of social media content, based on  
21 nothing more than conclusory allegations, continues the pattern of harassment that employment  
22 protection statutes prohibit.

23 67. Staying discovery pending adequate pleading will prevent the Court from managing  
24 extensive discovery disputes over requests that may become irrelevant once Defendant specifies its  
25 actual defenses. If Defendant must identify specific policies allegedly violated, discovery can focus  
26 on those policies rather than requiring production of all policies ever adopted by Defendant. A  
27 protective order limiting discovery to Plaintiff's prima facie case elements until Defendant replaces  
28 its conclusory defenses with factual specificity will protect both Plaintiff from harassment and the

1 Court from managing discovery disputes based on deficient pleading. This approach encourages  
 2 prompt resolution of pleading deficiencies while preventing Defendant from using the discovery  
 3 process to continue retaliatory conduct through the litigation system.

## 4 CONCLUSION

5  
 6 68. Federal courts in the Northern District of California apply notice pleading  
 7 standards to affirmative defenses, requiring only fair notice of the defense's factual basis rather than  
 8 detailed plausibility pleading. However, purely boilerplate defenses without any factual support  
 9 violate Rule 11 and will be struck. When re-pleading after defenses are struck, defendants must  
 10 provide basic factual allegations connecting each defense to the specific claims and circumstances  
 11 of the case, while still meeting only the liberal notice pleading standard rather than heightened  
 12 Twombly/Iqbal requirements.

13 69. Defendant's repled affirmative defenses fail for the same reason the Court  
 14 previously struck them: they consist of bare legal conclusions unsupported by any facts. While  
 15 courts are hesitant to strike defenses, they do so when the party offers 'nothing more than labels  
 16 and conclusions' (*Kohler*, 280 F.R.D. at 563). Where, as here, the defense alleges deceit, fraud, or  
 17 criminal conduct, Rule 9(b) requires particularity — not general accusations. Defendant has  
 18 instead chosen to plead vaguely, knowing that its actual defense — articulated clearly in a prior  
 19 administrative forum — would amount to an admission of liability under Labor Code § 1102.5 and  
 20 *Tamney* wrongful termination standards.

21 70. Apple's amended defenses represent systematic litigation abuse that wastes judicial  
 22 resources, harasses Plaintiff through discovery, and continues the misconduct underlying this case.  
 23 Normal litigation process cannot cure deliberate falsehoods contradicted by Defendant's own  
 24 records. These defenses should be struck with prejudice to prevent further abuse and protect the  
 25 integrity of federal pleading rules

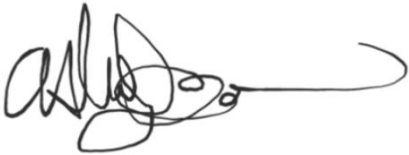
26 71. WHEREFORE, Plaintiff respectfully requests that this Court:

- 27 • **GRANT** this Motion to Strike Affirmative Defenses 2-4, 6-11, and 14-15 with  
 28 prejudice;
- **ENTER** a protective order limiting Apple's discovery to facts specifically

1                   pleaded with factual support;

- 2                   • **GRANT** such other relief as the Court deems just and proper..

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4       Filed: June 16 2025  
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11 **/s/ Ashley M. Gjovik**  
12 *Pro Se Plaintiff*

13 **Email:** legal@ashleygjovik.com

14 **Physical Address:** Boston, Massachusetts

15 **Mailing Address:** 2108 N St. Ste. 4553 Sacramento, CA, 95816

16 **Phone:** (408) 883-4428 ‘  
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## EXHIBITS



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**XI. EXHIBIT A**

**Defendant Apple’s Privilege Log**

**1 – Original Version (4pt font)**

**2 – Enhanced version with larger font**

Case No. 23-cv-4597-EMC  
Apple, Inc. Privilege Log

Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
001		2021-03-17 to 2021-03-18	Jain, Antone; <b>Rubenstein, Debra</b> ; <b>Said, Deena</b> ; Gies Timos	<b>Rubenstein, Debra</b> ; Steiger, Michael; Jain, Antone; <b>Said, Deena</b> ; Gies Timos	Email	7	Re: Action Needed- SD01 EHS Request	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
002		2021-03-19	<b>Rubenstein, Debra</b> ; Steiger, Michael; Jain, Antone		Document	4	DRAFT Talking Points SD01 comms 2 with djr & mts comments.docx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
003		2021-03-19	<b>Rubenstein, Debra</b> ; Jain, Antone		Document	4	DRAFT Talking Points SD01 comms 2 with djr comments.docx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
004		2021-03-19	Steiger, Michael	<b>Rubenstein, Debra</b> ; Baylosis, Ed; Schmidt, Elizabeth; Steiger, Michael; Sidlow, Scott; Creighton, Sue	Calendar File	2	SD01 - Vapor Intrusion comms plan	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
005		2021-03-19	Steiger, Michael	<b>Rubenstein, Debra</b> ; Baylosis, Ed; Schmidt, Elizabeth; Steiger, Michael; Sidlow, Scott; Creighton, Sue	Calendar File	2	SD01 - Vapor Intrusion comms plan	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
006		2021-03-17 to 2021-03-19	Steiger, Michael; Jain, Antone; DeBaene, Austin	Jain, Antone; DeBaene, Austin; Huynh, Tom; <b>Rubenstein, Debra</b> ; Steiger, Michael	Email	6	Re: Action Needed- SD01 EHS Request	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
007		2021-03-17 to 2021-03-19	Steiger, Michael; Baylosis, Ed; Creighton, Sue; Jain, Antone	Baylosis, Ed; Schmidt, Elizabeth; Creighton, Sue; Sidlow, Scott; <b>Rubenstein, Debra</b> ; Steiger, Michael; DeBaene, Austin; Huynh, Tom; Jain, Antone	Email with attachments	16	Re: Privileged and confidential: Re: [Important] Action Needed- SD01 EHS Request; DRAFT Talking Points SD01 comms 2 with djr comments.docx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
008		2021-03-18 to 2021-03-19	Steiger, Michael; <b>Rubenstein, Debra</b> ; Jain, Antone	<b>Rubenstein, Debra</b> ; Jain, Antone; Steiger, Michael	Email with attachments	15	Re: Review - Draft talking points; DRAFT Talking Points SD01 comms 2 with djr & mts comments.docx; DRAFT Talking Points SD01 comms 2 with djr comments.docx; DRAFT Talking Points SD01 comms 2.docx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
009		2021-03-26	<b>Rubenstein, Debra</b>	Jain, Antone; <b>Rubenstein, Debra</b> ; Polkes, Helen; <b>Perez, Isela</b> ; Waibel, Jenna; Steiger, Michael	Calendar File	1	Preparation for meeting in follow up to questions re SD01	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
010		2021-03-18 to 2021-03-26	<b>Rubenstein, Debra</b> ; Jain, Antone; Souza, Emily; Polkes, Helen; Steiger, Michael; Waibel, Jenna	Polkes, Helen; Jain, Antone; Shifman, Moshe (Mo); <b>Matarrese, Kyle</b> ; <b>Perez, Isela</b> ; Souza, Emily; Waibel, Jenna; Steiger, Michael; DeBaene, Austin; Huynh, Tom	Email	26	Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
011		2021-03-29	<b>Rubenstein, Debra</b> ; Steiger, Michael	Steiger, Michael; <b>Rubenstein, Debra</b>	Email	2	Re: SD01 EHS Request	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
012		2021-03-18 to 2021-03-29	Waibel, Jenna; Steiger, Michael; <b>Rubenstein, Debra</b> ; Polkes, Helen; Souza, Emily	Steiger, Michael; <b>Rubenstein, Debra</b> ; Waibel, Jenna; Polkes, Helen; <b>Matarrese, Kyle</b> ; <b>Perez, Isela</b> ; Jain, Antone; Shifman, Moshe	Email	15	Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
013		2021-03-31	Steiger, Michael	Jain, Antone; <b>Rubenstein, Debra</b> ; Souza, Emily; Polkes, Helen; <b>Perez, Isela</b> ; Waibel, Jenna; <b>Matarrese, Kyle</b> ; Steiger, Michael; Shifman, Moshe	Calendar File	1	SD01	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
014		2021-04-02	Steiger, Michael; Jain, Antone		Document	5	SD01 Talking Points - mts edits.docx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.

Glenk v. Apple  
Case No. 23-cv-4597-EMC  
Apple, Inc. Privilege Log

Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
015		2021-03-17 to 2021-04-02	<b>Rubenstein, Debra;</b> <b>Matarrese, Kyle; Perez, Isela;</b> Souza, Emily; Steiger, Michael	<b>Matarrese, Kyle; Perez, Isela;</b> Souza, Emily; Shifman, Moshe (Mo); Steiger, Michael; Jain, Antone; <b>Rubenstein, Debra</b>	Email with attachments	20	Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT; SD01 Talking Points.docx; SD01 Talking Points - mts edits.docx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
016		2021-03-18 to 2021-04-03	Waibel, Jenna; Steiger, Michael; Polkes, Helen; <b>Rubenstein, Debra;</b> Souza, Emily	Steiger, Michael; Polkes, Helen; Jain, Antone; Shifman, Moshe (Mo); <b>Matarrese, Kyle; Perez, Isela;</b> Souza, Emily; <b>Rubenstein, Debra;</b> Waibel, Jenna	Email	16	Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
017		2021-03-18 to 2021-04-05	<b>Rubenstein, Debra;</b> Steiger, Michael; Waibel, Jenna; Polkes, Helen; Souza, Emily	Waibel, Jenna; Steiger, Michael; Polkes, Helen; Jain, Antone; Shifman, Moshe (Mo); <b>Matarrese, Kyle; Perez, Isela;</b> Souza, Emily; <b>Rubenstein, Debra;</b> Schmidt, Elizabeth	Email	18	Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
018		2021-04-08 to 2021-04-09	<b>Perez, Isela;</b> Polkes, Helen	Polkes, Helen; Waibel, Jenna; <b>Perez, Isela</b>	Email	2	Re: Privileged and confidential	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
019		2021-04-09	Steiger, Michael	Waibel, Jenna; Jain, Antone; <b>Rubenstein, Debra;</b> Polkes, Helen; <b>Perez, Isela;</b> <b>Matarrese, Kyle;</b> Shifman, Moshe (Mo); Souza, Emily	Email	8	Fwd: SD01 EHS Request - 4/2 Notes	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
020		2021-04-09	Polkes, Helen; <b>Perez, Isela</b>	<b>Perez, Isela;</b> Waibel, Jenna; Polkes, Helen	Email	2	Re: Privileged and confidential	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
021		2021-04-10	Steiger, Michael	<b>Rubenstein, Debra;</b> Jain, Antone	Email	8	Fwd: SD01 EHS Request - 4/2 Notes	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
022	APL-GAELG_00001248	2021-04-09 to 2021-04-10	Polkes, Helen	Waibel, Jenna	Email	5	Re: Escalated to Dan West—Fwd: SD01 EHS Request - ER Note	Attorney Client Privilege	Attorney-client privileged communications between employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
023		2021-03-18 to 2021-04-11	Steiger, Michael; Waibel, Jenna; Polkes, Helen; <b>Rubenstein, Debra;</b> Souza, Emily	Polkes, Helen; Jain, Antone; Souza, Emily; <b>Perez, Isela; Matarrese, Kyle;</b> Shifman, Moshe (Mo); Waibel, Jenna; <b>Rubenstein, Debra;</b> Steiger, Michael	Email with attachments	281	Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT; SD01 Talking Points.docx; 2016-0211-Microwave-VI Evaluation Report_FINAL.pdf	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
024		2021-04-11	Steiger, Michael	<b>Rubenstein, Debra;</b> Jain, Antone	Email	26	Fwd: SD01 EHS Request - 4/2 Notes	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
025	APL-GAELG_00001254	2021-04-12	Waibel, Jenna	Polkes, Helen	Messages	4	Message_JennaWaibel_2021-04-12_18-11-48.pdf	Attorney Client Privilege	Message with redacted text reflecting communication of legal advice from counsel ( <b>Perez, Isela</b> ) from employees acting under the direction and supervision of counsel related to the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues.
026		2021-03-18 to 2021-04-13	<b>Rubenstein, Debra;</b> Waibel, Jenna; Steiger, Michael; Polkes, Helen; Souza, Emily	Waibel, Jenna; Polkes, Helen; Steiger, Michael; Jain, Antone; Souza, Emily; <b>Perez, Isela; Matarrese, Kyle;</b> Shifman, Moshe (Mo); <b>Rubenstein, Debra</b>	Email	20	Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
027		2021-04-11 to 2021-04-13	Jain, Antone; <b>Rubenstein, Debra;</b> Steiger, Michael	<b>Rubenstein, Debra;</b> Steiger, Michael; Jain, Antone	Email with attachments	42	Re: SD01 EHS Request - 4/2 Notes -- PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT; draft SD01 talking points 2nd meeting.pages; Draft Response to Ashley - 4-11-21 PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT with djr comments.docx; Draft Response to Ashley - 4-11-21 PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT.docx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
028		2021-04-26	Steiger, Michael	Jain, Antone; <b>Rubenstein, Debra;</b> Schmidt, Elizabeth; Polkes, Helen; <b>Perez, Isela;</b> Waibel, Jenna; Steiger, Michael; Shifman, Moshe	Calendar File	1	EPA - Ashley - SD01	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.

Glen V. Apple  
Case No. 23-cv-4597-EMC  
Apple, Inc. Privilege Log

Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
029		2021-04-26	Steiger, Michael; <b>Rubenstein, Debra</b> ; <b>Perez, Isela</b> ; Waibel, Jenna	<b>Rubenstein, Debra</b> ; <b>Perez, Isela</b> ; Waibel, Jenna; Shifman, Moshe; Souza, Emily; Polkes, Helen; <b>Matarrese, Kyle</b> ; Jain, Antone; Schmidt, Elizabeth; Steiger, Michael	Email	7	Re: Employee Concerns: TRW Microwave Site	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
030		2021-04-24 to 2021-04-27	Polkes, Helen; <b>Rubenstein, Debra</b> ; Steiger, Michael	Steiger, Michael; <b>Perez, Isela</b> ; Shifman, Moshe; Waibel, Jenna; Jain, Antone; <b>Rubenstein, Debra</b> ; Polkes, Helen	Email with attachments	2	Privileged and confidential; 3-%2B14087837834-1619213246000-1	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
031		2021-04-27	Steiger, Michael	<b>Rubenstein, Debra</b> ; <b>Perez, Isela</b> ; Jain, Antone; Waibel, Jenna; Shifman, Moshe; <b>Matarrese, Kyle</b> ; Schmidt, Elizabeth	Email	3	Fwd: Questions about speech related to Apple's buildings on chemical release sites	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
032		2021-04-27	Polkes, Helen	Bertolus, Yannick; Bowman, Megan; Waibel, Jenna; <b>Perez, Isela</b>	Email	1	Privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
033		2021-04-26 to 2021-04-27	Bertolus, Yannick; Polkes, Helen; Bowman, Megan; Waibel, Jenna	<b>Perez, Isela</b> ; Bowman, Megan; John Ternus; Polkes, Helen; Waibel, Jenna	Email	3	Fwd: Privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
034		2021-04-27	Waibel, Jenna; Steiger, Michael	Shifman, Moshe; <b>Perez, Isela</b> ; <b>Rubenstein, Debra</b> ; Jain, Antone; Waibel, Jenna; <b>Matarrese, Kyle</b> ; Schmidt, Elizabeth	Email	5	Privileged & Confidential---Fwd: Questions about speech related to Apple's buildings on chemical release sites	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
035		2021-04-24 to 2021-04-27	Steiger, Michael; <b>Rubenstein, Debra</b> ; Polkes, Helen	Polkes, Helen; <b>Perez, Isela</b> ; Shifman, Moshe; Waibel, Jenna; Jain, Antone; <b>Rubenstein, Debra</b>	Email	2	Re: Privileged and confidential	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
036		2021-04-26 to 2021-04-28	Polkes, Helen; Lagares, Antonio; Waibel, Jenna; Bowman, Megan; Bertolus, Yannick	Bertolus, Yannick; Bowman, Megan; <b>Perez, Isela</b> ; Waibel, Jenna; Polkes, Helen	Email	3	Re: Privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
037		2021-04-30	Waibel, Jenna; Polkes, Helen	Polkes, Helen; <b>Perez, Isela</b> ; Waibel, Jenna	Email	4	Re: Privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
038		2021-05-01 to 2021-05-03	Warner, Adelmise; <b>Rice, Debbie</b>	<b>Rice, Debbie</b> ; Warner, Adelmise	Email	3	Re: HR legal weekly update 4.30.21	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
039		2021-04-27 to 2021-05-06	Jain, Antone; <b>Rubenstein, Debra</b> ; Steiger, Michael	<b>Rubenstein, Debra</b> ; Steiger, Michael; Jain, Antone	Email with attachments	29	Re: SD01 EHS Request - 4/2 Notes; Draft Response to Ashley - 4-30-21 PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT with djr comments .docx; Draft Response to Ashley - 4-30-21 PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT .docx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
040		2021-05-11	Steiger, Michael		Document	9	Talking Points for Ashley - 5-11-21 PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT-3.docx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
041		2021-05-10 to 2021-05-12	Waibel, Jenna; Polkes, Helen; <b>Perez, Isela</b>	Polkes, Helen; <b>Perez, Isela</b> ; Waibel, Jenna	Email	7	Re: Privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.

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042		2021-04-30 to 2021-05-12	Jain, Antone; Waibel, Jenna; Steiger, Michael	Waibel, Jenna; Steiger, Michael; <b>Rubenstein, Debra</b> ; Jain, Antone	Email	4	Re: Names for additional conversations - Privileged and Confidential - Attorney work product	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
043		2021-05-11 to 2021-05-12	<b>Perez, Isela</b> ; Waibel, Jenna; Polkes, Helen	Waibel, Jenna; Polkes, Helen; <b>Perez, Isela</b>	Email	3	Re: Privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
044		2021-05-11 to 2021-05-12	<b>Perez, Isela</b> ; Waibel, Jenna; Polkes, Helen	Waibel, Jenna; Polkes, Helen; <b>Perez, Isela</b>	Email	2	Re: Privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
045		2021-04-30 to 2021-05-13	Jain, Antone; Waibel, Jenna; Steiger, Michael	Waibel, Jenna; Steiger, Michael; <b>Rubenstein, Debra</b> ; Jain, Antone	Email	5	Re: Names for additional conversations - Privileged and Confidential - Attorney work product	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
046		2021-05-11 to 2021-05-13	<b>Matarese, Kyle</b> ; <b>Rubenstein, Debra</b> ; Steiger, Michael	<b>Rubenstein, Debra</b> ; Steiger, Michael; Waibel, Jenna; Jain, Antone; Schmidt, Elizabeth; <b>Perez, Isela</b> ; Polkes, Helen; Shifman, Moshe; <b>Matarese, Kyle</b>	Email with attachments	4	Re: EHS Talking Points for Follow-Up with Ashley; PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT; IAL+-+ATTORNEY+WORK+PRODUCT+with+djr+comments.docx; Talking+Points+for+Ashley+-+5-11-21+PRIVILEGED+AND+CONFIDENTIAL+-+ATTORNEY+WORK+PRODUCT-3.docx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
047		2021-04-27 to 2021-05-17	<b>Rubenstein, Debra</b> ; <b>Matarese, Kyle</b> ; Waibel, Jenna; Steiger, Michael	<b>Matarese, Kyle</b> ; Waibel, Jenna; Steiger, Michael; <b>Perez, Isela</b> ; Jain, Antone; Shifman, Moshe; Schmidt, Elizabeth; <b>Rubenstein, Debra</b>	Email	15	Re: Questions about speech related to Apple's buildings on chemical release sites	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
048		2021-05-17	Polkes, Helen	<b>Perez, Isela</b> ; Waibel, Jenna	Email	5	Privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
049		2021-05-17 to 2021-05-18	Waibel, Jenna; Schiesl, Dallas	Schiesl, Dallas; <b>Perez, Isela</b> ; Shifman, Moshe; Waibel, Jenna	Email	2	Re: Privileged & Confidential--Additional WC case	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy, and in anticipation of litigation.
050		2021-05-17 to 2021-05-18	Schiesl, Dallas; Waibel, Jenna	Waibel, Jenna; <b>Perez, Isela</b> ; Shifman, Moshe; Schiesl, Dallas	Email	2	Re: Privileged & Confidential--Additional WC case	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
051		2021-05-21	Polkes, Helen; Waibel, Jenna	Waibel, Jenna; <b>Perez, Isela</b> ; Polkes, Helen	Email	4	Re: Privileged & confidential--Fwd: Ashley Gjovik/Dan - 4/29 Meeting Notes	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
052		2021-05-22	Waibel, Jenna	<b>Perez, Isela</b> ; Polkes, Helen	Email with attachments	7	Privileged & Confidential--Fwd: Request for Denial Authorization on Environmental/Chemical Exposure Claim - Ashley Gjovik, Claim 30217483107-0001; image001.jpg	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy, and in anticipation of litigation.
053		2021-04-27 to 2021-05-26	Waibel, Jenna; Sidlow, Scott; <b>Rubenstein, Debra</b> ; Steiger, Michael; Jain, Antone; <b>Perez, Isela</b>	<b>Rubenstein, Debra</b> ; <b>Perez, Isela</b> ; Steiger, Michael; <b>Matarese, Kyle</b> ; Jain, Antone; Shifman, Moshe; Schmidt, Elizabeth; Sidlow, Scott; Waibel, Jenna	Email	12	Re: Privileged & Confidential-- Re: Questions about speech related to Apple's buildings on chemical release sites	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
054		2021-06-03 to 2021-06-04	Polkes, Helen; <b>Perez, Isela</b> ; Waibel, Jenna	<b>Perez, Isela</b> ; Waibel, Jenna; Polkes, Helen	Email	4	Re: Privileged & Confidential-- Fwd: Wrap up call today	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
055		2021-06-03 to 2021-06-04	<b>Perez, Isela</b> ; Waibel, Jenna	Waibel, Jenna; Polkes, Helen; <b>Perez, Isela</b>	Email	3	Re: Privileged & Confidential-- Fwd: Wrap up call today	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.

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056		2021-05-20 to 2021-06-08	Sidlow, Scott; Waibel, Jenna; <b>Rubenstein, Debra</b> ; Steiger, Michael; Jain, Antone; <b>Perez, Isela</b>	Waibel, Jenna; Jain, Antone; <b>Rubenstein, Debra</b> ; <b>Perez, Isela</b> ; Steiger, Michael; <b>Matarrese, Kyle</b> ; Shifman, Moshe; Schmidt, Elizabeth; Sidlow, Scott	Email	2	Re: SD01 additional EHS communications - privileged and confidential - attorney work product	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
057		2021-06-10	<b>Rubenstein, Debra</b> ; Waibel, Jenna	Waibel, Jenna; <b>Perez, Isela</b> ; Polkes, Helen; Shifman, Moshe; Steiger, Michael; Jain, Antone; Sidlow, Scott; <b>Matarrese, Kyle</b> ; Schmidt, Elizabeth; <b>Rubenstein, Debra</b>	Email	2	Re: Privileged & Confidential- additional meeting needed on VI	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
058		2021-06-11	Waibel, Jenna		Document	5	AMR_Investigation_Summary_D. Powers_Jun2021.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
059		2021-06-11	Waibel, Jenna		Document	11	A. Gjovik Interview Notes.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
060		2021-06-12	Waibel, Jenna		Document	6	D. Powers Interview Notes .pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
061		2021-06-12	Waibel, Jenna		Document	2	N. Balamurugan Interview Notes.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
062		2021-06-12	Waibel, Jenna		Document	2	J. Markham Interview Notes.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
063		2021-06-12	Waibel, Jenna		Document	1	I&D Interview Notes.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
064		2021-06-12	Waibel, Jenna		Document	2	M. Ertell Interview Notes .pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
065		2021-06-12	Waibel, Jenna		Document	2	M. Mathur interview Notes.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
066		2021-06-12	Waibel, Jenna		Document	4	D. West Interview Notes.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
067		2021-06-12	Waibel, Jenna		Document	2	J. Ivan Interview Notes.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
068		2021-06-04 to 2021-06-16	<b>Perez, Isela</b> ; Waibel, Jenna	Waibel, Jenna; Polkes, Helen; <b>Perez, Isela</b>	Email	8	Re: Privileged & Confidential-- DRAFTED notes for call with AG	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
069		2021-05-20 to 2021-06-21	Waibel, Jenna; Jain, Antone; Sidlow, Scott	Jain, Antone; Sidlow, Scott; <b>Rubenstein, Debra</b> ; <b>Perez, Isela</b> ; Steiger, Michael; <b>Matarrese, Kyle</b> ; Shifman, Moshe; Schmidt, Elizabeth; Waibel, Jenna	Email	3	Re: SD01 additional EHS communications - privileged and confidential - attorney work product	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
070		2021-06-23	Waibel, Jenna		Document	5	AMR_Investigation_Summary_D. Powers_Jun2021.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
071		2021-06-10 to 2021-06-23	Jain, Antone; Polkes, Helen; <b>Rubenstein, Debra</b> ; Waibel, Jenna	Polkes, Helen; <b>Rubenstein, Debra</b> ; Schmidt, Elizabeth; <b>Matarrese, Kyle</b> ; Sidlow, Scott; Steiger, Michael; Waibel, Jenna; Shifman, Moshe; <b>Perez, Isela</b> ; Jain, Antone	Email with attachments	5	Re: Privileged & Confidential- additional meeting needed on VI; PastedGraphic-1.png; Re_+Follow+up+to+your+People+Support+reach+out+.eml	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.



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072		2021-06-22 to 2021-06-23	<b>Rubenstein, Debra;</b> <b>Perez, Isela;</b> Waibel, Jenna	<b>Perez, Isela;</b> Waibel, Jenna; Polkes, Helen; Shifman, Moshe; <b>Rubenstein, Debra</b>	Email	3	Re: Discussion re contaminated sites on SLACK	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
073		2021-06-29	Waibel, Jenna	Polkes, Helen; <b>Perez, Isela</b>	Email	5	Privileged & Confidential—Fwd: Follow up call today (need info before doctor appt tomorrow)	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
074		2021-07-06	Jain, Antone	<b>Rubenstein, Debra;</b> <b>Perez, Isela;</b> Polkes, Helen; Steiger, Michael; Waibel, Jenna	Email	2	Fwd: Follow up call next week	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
075		2021-07-02 to 2021-07-09	Waibel, Jenna; Polkes, Helen	Jain, Antone; <b>Rubenstein, Debra;</b> Polkes, Helen; <b>Perez, Isela;</b> Steiger, Michael; Waibel, Jenna	Email	3	Re: Privileged and Confidential -- Attorney work product Fwd: Discuss any questions about indoor air management at SD01, floor penetration survey and vapor intrusion mitigation	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
076		2021-07-15	Okpo, Ekelemchi		Document	3	Ashley Gjovik (Prep meetings pre initial contact).pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations, and the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues, performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
077		2021-07-18	Polkes, Helen	<b>Perez, Isela;</b> Lagares, Antonio; Waibel, Jenna; Bowman, Megan	Email	4	Privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
078		2021-07-19	Lagares, Antonio	Lagares, Antonio; Okpo, Ekelemchi; Polkes, Helen; <b>Perez, Isela;</b> Waibel, Jenna	Calendar File	1	Privileged and Confidential - Gjovik	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
079		2021-07-19	Waibel, Jenna	Jain, Antone; Lagares, Antonio; <b>Rubenstein, Debra;</b> Polkes, Helen; <b>Perez, Isela;</b> Waibel, Jenna	Calendar File	1	EHS/ AG Sync	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
080		2021-07-19	<b>Perez, Isela;</b> Polkes, Helen	Polkes, Helen; Okpo, Ekelemchi; Waibel, Jenna; Lagares, Antonio; <b>Perez, Isela</b>	Email	9	Re: privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
081		2021-07-19	Polkes, Helen	<b>Perez, Isela;</b> Waibel, Jenna; Okpo, Ekelemchi; Lagares, Antonio	Email with attachments	5	Privileged and confidential; PastedGraphic-3.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
082		2021-07-16 to 2021-07-21	Souza, Emily; Bowman, Megan; Shifman, Moshe; Polkes, Helen	Bowman, Megan; Shifman, Moshe (Mo); Polkes, Helen; Lagares, Antonio; Okpo, Ekelemchi; <b>Perez, Isela;</b> Waibel, Jenna; Souza, Emily	Email	3	Re: Privileged and confidential	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy.
083		2021-07-16 to 2021-07-21	Bowman, Megan; <b>Perez, Isela;</b> Souza, Emily; Shifman, Moshe; Polkes, Helen	<b>Perez, Isela;</b> Souza, Emily; Shifman, Moshe (Mo); Polkes, Helen; Lagares, Antonio; Okpo, Ekelemchi; Waibel, Jenna; Bowman, Megan	Email	3	Re: Privileged and confidential	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy.
084		2021-07-23	Waibel, Jenna		Document	4	Privileged & Confidential- A. Gjovik Concerns Matrix.numbers	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
085		2021-07-22 to 2021-07-23	Okpo, Ekelemchi; Waibel, Jenna; Polkes, Helen; <b>Perez, Isela</b>	Waibel, Jenna; Polkes, Helen; <b>Perez, Isela;</b> Tony Lagares; Okpo, Ekelemchi	Email	2	Re: Privileged and Confidential - A.G. Sync	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
086		2021-07-26	Warner, Adelmise; Reicher, Joni; <b>Perez, Isela;</b> <b>Rice, Debbie</b>	<b>Perez, Isela;</b> Reicher, Joni; <b>Rice, Debbie;</b> Kim, Kwang; Warner, Adelmise	Email	4	Re: Privileged and Confidential - A.G. Women in SWE	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.

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Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
087		2021-07-20 to 2021-07-27	<b>Rubenstein, Debra</b> ; Jain, Antone; Waibel, Jenna	Jain, Antone; Waibel, Jenna; <b>Perez, Isela</b> , Polkes, Helen; <b>Rubenstein, Debra</b>	Email	4	Re: Privileged & Confidential- Meeting notes from 7/7/21	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
088		2021-07-28	Okpo, Ekelemchi		Document	3	Employment History AG (Working Draft).pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
089		2021-07-27 to 2021-07-28	Reicher, Joni; Souza, Emily	Souza, Emily; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Okpo, Ekelemchi; Warner, Adelmise; Reicher, Joni; Shifman, Moshe	Email	4	Re: Attorney client privilege: Gjovik's request for accommodation	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy.
090	APL-GAELG 00001040	2021-07-28			Document	1	2020 Powers Feedback.pdf	Attorney Client Privilege	Documents reflecting privileged and confidential internal projects, assignments and tasks associated with Apple's legal operations.
091	APL-GAELG 00001033	2021-07-28			Document	1	2020 Powers Feedback.pages	Attorney Client Privilege	Documents reflecting privileged and confidential internal projects, assignments and tasks associated with Apple's legal operations.
092	APL-GAELG 00001026	2021-07-28			Document	1	2020 Powers Feedback.pdf	Attorney Client Privilege	Documents reflecting privileged and confidential internal projects, assignments and tasks associated with Apple's legal operations.
093		2021-07-29	Jain, Antone	Jain, Antone; <b>Rubenstein, Debra</b> ; Schmidt, Elizabeth; Thomas, Robert	Calendar File	1	SD01 & Ashley	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
094		2021-07-29	Reicher, Joni	<b>Rice, Debbie</b> ; Okpo, Ekelemchi; Souza, Emily; <b>Perez, Isela</b> ; Reicher, Joni	Calendar File	1	Attorney Client privilege AG Accommodation	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy.
095		2021-07-27 to 2021-07-29	<b>Rubenstein, Debra</b> ; Lagares, Antonio; Waibel, Jenna; Okpo, Ekelemchi	Okpo, Ekelemchi; Waibel, Jenna; Polkes, Helen; <b>Perez, Isela</b> ; Lagares, Antonio; Jain, Antone; <b>Rubenstein, Debra</b>	Email	3	Re: [ Privileged and Confidential] Questions about TRW Microwave	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
096		2021-07-29	<b>Perez, Isela</b> ; Okpo, Ekelemchi; Waibel, Jenna	Waibel, Jenna; Okpo, Ekelemchi; Tony Lagares; Polkes, Helen; <b>Perez, Isela</b>	Email	3	Re: Privileged and Confidential - A.G. Keynote	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
097		2021-07-29	Waibel, Jenna; <b>Rubenstein, Debra</b> ; Jain, Antone	<b>Rubenstein, Debra</b> ; Lagares, Antonio; Jain, Antone; Thomas, Robert; Waibel, Jenna	Email	3	Re: SD01 Ashley Timeline - [Privileged & Confidential]	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
098		7/29/2021	<b>Rubenstein, Debra</b> ; Steiger, Michael	Thomas, Robert; Jain, Antone; Steiger, Michael; Schmidt, Elizabeth; Sidlow, Scott; Bayfosis, Ed; <b>Rubenstein, Debra</b>	Email	5	Fwd: [Important] Action Needed- SD01 EHS Request	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
099		2021-07-29	Okpo, Ekelemchi; Reicher, Joni	Reicher, Joni; <b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Okpo, Ekelemchi	Email with attachments	3	Re: ACP - AG post today; Screen Shot 2021-07-29 at 10.38.43 AM.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
100		2021-07-29	Reicher, Joni	Okpo, Ekelemchi; <b>Perez, Isela</b> ; <b>Rice, Debbie</b>	Email with attachments	2	ACP - AG post today; Screen Shot 2021-07-29 at 10.38.43 AM.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
101		2021-07-29	Reicher, Joni; <b>Perez, Isela</b> ; <b>Rice, Debbie</b>	<b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Okpo, Ekelemchi; Reicher, Joni	Email	2	Re: ACP - AG post today	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
102		2021-07-30	Jain, Antone	Jain, Antone; <b>Rubenstein, Debra</b> ; Schmidt, Elizabeth; Thomas, Robert	Calendar File	1	SD01 & Ashley	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
103		2021-07-30	Reicher, Joni	<b>Rice, Debbie</b> ; Okpo, Ekelemchi; <b>Perez, Isela</b> ; Waldo, Jen; Reicher, Joni; Rosenstock, Josh; Qualye, Kristin Huguet	Calendar File	1	Attorney Client privileged Next steps AG	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.



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104		2021-07-30	Reicher, Joni	<b>Rice, Debbie</b> ; Okpo, Ekelemchi; <b>Perez, Isela</b> ; Reicher, Joni	Calendar File	1	ACP follow up AG	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
105		2021-07-30	Polkes, Helen; <b>Perez, Isela</b>	<b>Perez, Isela</b> ; Okpo, Ekelemchi; Lagares, Antonio; Waibel, Jenna; Polkes, Helen	Email	9	Re: Privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
106		2021-07-30	<b>Perez, Isela</b> ; Lagares, Antonio; Okpo, Ekelemchi	Lagares, Antonio; Okpo, Ekelemchi; <b>Perez, Isela</b>	Email	9	Re: Notes from our Friday call	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
107		2021-07-30	<b>Rice, Debbie</b> ; Reicher, Joni	Reicher, Joni; <b>Perez, Isela</b> ; <b>Rice, Debbie</b>	Email with attachments	4	Re: ACP AG timeline and next steps; ACP Timeline AG as of 7.30.21.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
108		2021-07-29 to 2021-07-31	Reicher, Joni; Okpo, Ekelemchi	Okpo, Ekelemchi; <b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Reicher, Joni	Email with attachments	4	Re: ACP - AG post today; Screen Shot 2021-07-29 at 10.38.43 AM.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
109		2021-07-31	Okpo, Ekelemchi		Document	6	ACP Timeline AG as of 7.30.21.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
110		2021-07-30 to 2021-07-31	<b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Reicher, Joni	<b>Rice, Debbie</b> ; Reicher, Joni; <b>Perez, Isela</b>	Email	2	Re: ACP AG timeline and next steps	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
111		2021-07-30 to 2021-07-31	<b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Reicher, Joni	<b>Perez, Isela</b> ; Reicher, Joni; <b>Rice, Debbie</b>	Email	2	Re: ACP AG timeline and next steps	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
112		2021-07-30 to 2021-08-01	Okpo, Ekelemchi; Reicher, Joni; <b>Perez, Isela</b> ; <b>Rice, Debbie</b>	Reicher, Joni; <b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Okpo, Ekelemchi	Email with attachments	5	Re: ACP: AG Slack activity 7/30; Screen Shot 2021-07-30 at 7.43.39 PM.png; Screen Shot 2021-07-30 at 7.43.14 PM.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
113		2021-08-01	Warner, Adelmise; Reicher, Joni; <b>Adams, Kate</b> ; O'Brien, Deirdre	<b>Rice, Debbie</b> ; Reicher, Joni; Warner, Adelmise; <b>Adams, Kate</b> ; O'Brien, Deirdre; <b>Perez, Isela</b> ; Waldo, Jen; Huguet, Kristin; Rosenstock, Josh	Email	4	Re: ATTORNEY CLIENT PRIVILEGED - Urgent Employee Matter	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations, and the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues, performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
114		2021-07-30 to 2021-08-02	<b>Rice, Debbie</b> ; Reicher, Joni; Okpo, Ekelemchi	Reicher, Joni; Okpo, Ekelemchi; <b>Perez, Isela</b> ; <b>Rice, Debbie</b>	Email with attachments	3	Re: ACP Timeline; ACP Timeline AG as of 7.30.21.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
115		2021-08-02	Okpo, Ekelemchi	<b>Rice, Debbie</b> ; Okpo, Ekelemchi; <b>Perez, Isela</b> ; Reicher, Joni	Calendar File	1	ACP: AG Debrief	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
116		2021-07-27 to 2021-08-02	<b>Rubenstein, Debra</b> ; <b>Perez, Isela</b> ; Jain, Antone	<b>Perez, Isela</b> ; Jain, Antone; Schmidt, Elizabeth; Okpo, Ekelemchi; Lagares, Antonio; Polkes, Helen; Waibel, Jenna; <b>Rubenstein, Debra</b>	Email	26	Re: [Privileged and Confidential] Fwd: Questions about TRW Microwave	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
117		2021-07-29 to 2021-08-02	<b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Reicher, Joni; Richardson, Meagan; Souza, Emily	<b>Perez, Isela</b> ; Reicher, Joni; Richardson, Meg; Souza, Emily; Okpo, Ekelemchi; <b>Rice, Debbie</b>	Email	10	Re: Draft for Accommodation Support of Ashley Gjovik	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy, and in anticipation of litigation.
118		2021-08-02	<b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Reicher, Joni	<b>Perez, Isela</b> ; Reicher, Joni; <b>Rice, Debbie</b>	Email	2	Re: ACP - AG EHS claims	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.

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Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
119		2021-06-10 to 2021-08-02	<b>Perez, Isela</b> ; Waibel, Jenna; Lagares, Antonio	Waibel, Jenna; Lagares, Antonio; <b>Perez, Isela</b>	Email with attachments	15	Re: Privileged & Confidential-- Drafted Investigation summaries for review; AMR_Investigation_Summary_D. Powers_Jun2021.pages; AMR_Investigation_Brief_R. Yezpez_Jun2021.pages; AMR_Investigation_Summary_D. Powers_Jun2021.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
120		2021-08-03	Steiger, Michael		Document	9	Talking Points for Ashley - 5-11-21 PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT-3.pdf	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
121		2021-08-03	Okpo, Ekelemchi		Document	4	Meeting Notes for A. Gjovik EHS calls.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
122		2021-08-03	Okpo, Ekelemchi	<b>Rice, Debbie</b> ; Okpo, Ekelemchi; <b>Perez, Isela</b> ; Reicher, Joni	Calendar File	1	ACP - AG Debrief	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
123		2021-07-27 to 2021-08-03	Reicher, Joni; Okpo, Ekelemchi	Okpo, Ekelemchi; <b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Warner, Adelmise; Reicher, Joni	Email	2	Re: Attorney client privileged	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
124		2021-08-02 to 2021-08-03	Okpo, Ekelemchi; <b>Perez, Isela</b> ; Waibel, Jenna	<b>Perez, Isela</b> ; Waibel, Jenna; Okpo, Ekelemchi	Email	2	Re: Privileged and Confidential - EHS Notes	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
125		2021-08-02 to 2021-08-03	Okpo, Ekelemchi; <b>Perez, Isela</b> ; Waibel, Jenna	<b>Perez, Isela</b> ; Waibel, Jenna; Okpo, Ekelemchi	Email	3	Re: Privileged and Confidential - EHS Notes	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
126		2021-08-02 to 2021-08-03	<b>Perez, Isela</b> ; Okpo, Ekelemchi; Waibel, Jenna	Okpo, Ekelemchi; Waibel, Jenna; <b>Perez, Isela</b>	Email	3	Re: Privileged and Confidential - EHS Notes	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
127		2021-08-03	Reicher, Joni ; <b>Rice, Debbie</b> ; Okpo, Ekelemchi	<b>Rice, Debbie</b> ; Okpo, Ekelemchi; <b>Perez, Isela</b> ; Reicher, Joni	Email	2	Re: ACP: DRAFT Response to AG's 8/2 email	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
128		2021-08-02 to 2021-08-03	Reicher, Joni; <b>Perez, Isela</b> ; <b>Rice, Debbie</b>	<b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Reicher, Joni	Email	3	Re: ACP - AG EHS claims	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
129		2021-08-02 to 2021-08-03	<b>Perez, Isela</b> ; Reicher, Joni; <b>Rice, Debbie</b>	Reicher, Joni; <b>Rice, Debbie</b> ; <b>Perez, Isela</b>	Email	3	Re: ACP - AG EHS claims	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
130		2021-08-03	Okpo, Ekelemchi; <b>Rice, Debbie</b> ; Reicher, Joni	<b>Rice, Debbie</b> ; Reicher, Joni; <b>Perez, Isela</b> ; Okpo, Ekelemchi	Email	3	Re: ACP: DRAFT Response to AG's 8/2 email	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
131		2021-08-02 to 2021-08-03	<b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Reicher, Joni	Reicher, Joni; <b>Rice, Debbie</b> ; <b>Perez, Isela</b>	Email	3	Re: ACP - AG EHS claims	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
132		2021-08-03	Reicher, Joni; <b>Rice, Debbie</b> ; Okpo, Ekelemchi	<b>Rice, Debbie</b> ; Okpo, Ekelemchi; <b>Perez, Isela</b> ; Reicher, Joni	Email	3	Re: ACP: DRAFT Response to AG's 8/2 email	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.

Gjovik v. Apple  
Case No. 23-cv-4597-EMC  
Apple, Inc. Privilege Log

Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
133		2021-08-03 to 2021-08-04	Rubenstein, Debra; Perez, Isela	Perez, Isela; Jain, Antone; Schmidt, Elizabeth; Waibel, Jenna; Okpo, Ekelemchi; Rubenstein, Debra	Email with attachments	3	Re: (Time sensitive) Privileged and Confidential; SD01+Raised+items+and+EHS+Response.docx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
134		2021-08-04	Rice, Debbie; Okpo, Ekelemchi	Okpo, Ekelemchi; Rice, Debbie; Warner, Adelmise	Email	3	Re: Draft language for AG/misrepresentation privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
135		2021-08-04	Okpo, Ekelemchi	Rice, Debbie; Perez, Isela; Reicher, Joni	Email	2	"ACP" Fwd: Apple Confidential: Next Steps	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
136		2021-08-03 to 2021-08-04	Rice, Debbie; Reicher, Joni; Perez, Isela	Reicher, Joni; Perez, Isela; Okpo, Ekelemchi; Rice, Debbie	Email	2	Re: Privileged and Confidential - DRAFT Confirmatory email to AG	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
137		2021-08-03 to 2021-08-04	Rice, Debbie; Okpo, Ekelemchi; Reicher, Joni; Perez, Isela	Okpo, Ekelemchi; Reicher, Joni; Perez, Isela; Warner, Adelmise; Rice, Debbie	Email	4	Re: Privileged and Confidential - DRAFT Confirmatory email to AG	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
138		2021-08-03 to 2021-08-04	Reicher, Joni; Okpo, Ekelemchi; Perez, Isela; Rice, Debbie	Okpo, Ekelemchi; Perez, Isela; Rice, Debbie; Reicher, Joni	Email	3	Re: Privileged and Confidential - DRAFT Confirmatory email to AG	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
139		2021-08-05	Rice, Debbie; Okpo, Ekelemchi	Okpo, Ekelemchi; Warner, Adelmise; Perez, Isela; Rice, Debbie	Email	3	Re: "ACP" Fwd: Apple Confidential: Next Steps	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
140		2021-08-03 to 2021-08-05	Rubenstein, Debra; Perez, Isela	Perez, Isela; Schmidt, Elizabeth; Waibel, Jenna; Okpo, Ekelemchi; Reicher, Joni; Rice, Debbie; Kim, Kwang; Rubenstein, Debra	Email with attachments	4	Re: (Time sensitive) Privileged and Confidential; image2.jpeg.jpeg	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
141		2021-08-05	Reicher, Joni; Rice, Debbie	Reicher, Joni; O'Brien, Deirdre; Adams, Kate; Warner, Adelmise	Email	2	JR Notes Fwd: ACP Agenda for this morning	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
142		2021-08-03 to 2021-08-05	Adams, Kate; Huguet, Kristin; Reicher, Joni; O'Brien, Deirdre; Rice, Debbie; Warner, Adelmise; Low, Stella	Low, Stella; Waldo, Jen; Reicher, Joni; Perez, Isela; Rosenstock, Josh; Adams, Kate; O'Brien, Deirdre; Rice, Debbie; Warner, Adelmise; Huguet, Kristin	Email	7	Re: ATTORNEY CLIENT PRIVILEGED - Ashley tweet - Verge story in 30 minutes; Screen Shot 2021-08-04 at 1:58.44 PM.png; Screen Shot 2021-08-04 at 1:59.22 PM.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
143		2021-07-31 to 2021-08-05	Reicher, Joni ; O'Brien, Deirdre	Adams, Kate; Rice, Debbie; Waldo, Jen; Warner, Adelmise Roseme; Reicher, Joni; O'Brien, Deirdre	Email with attachments	7	Re: Background for tomorrow Fwd: ATTORNEY CLIENT PRIVILEGED - Urgent Employee Matter; Privileged & Confidential- A. Gjovik Concerns Matrix copy.numbers; Screen Shot 2021-07-31 at 6:05:16 AM.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations, and the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues, performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
144		2021-08-04 to 2021-08-05	Warner, Adelmise; Reicher, Joni; O'Brien, Deirdre	Rice, Debbie; Reicher, Joni; Warner, Adelmise; O'Brien, Deirdre	Email with attachments	11	Re: ATTORNEY CLIENT PRIVILEGED Re: Background for tomorrow; AMR_Investigation_Summary_D. Powers_Jun2021.pages; Privileged & Confidential- A. Gjovik Concerns Matrix.numbers	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
145		2021-08-04 to 2021-08-05	Rice, Debbie; Reicher, Joni; O'Brien, Deirdre; Adams, Kate; Rosenstock, Josh	Reicher, Joni; Adams, Kate; O'Brien, Deirdre; Waldo, Jen; Huguet, Kristin; Rice, Debbie; Low, Stella; Warner, Adelmise; Perez, Isela	Email	10	[Revised email] Re: Proposed email to AG Fwd: Privileged and Confidential; Re: For review-draft language from EO/AG privileged and confidential; Privileged and Confidential - Fwd: Apple places female engineering program manager on administrative leave after tweeting about sexism in the office - The Verge	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations, performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
146		2021-08-03 to 2021-08-06	Richardson, Meagan; Rice, Debbie; Reicher, Joni; Souza, Emily; Shifman, Moshe; Waibel, Jenna; Warner, Adelmise	Rice, Debbie; Reicher, Joni; Souza, Emily; Okpo, Ekelemchi; Perez, Isela; Shifman, Moshe (Mo); Richardson, Meg; Warner, Adelmise	Email with attachments	19	Re: ADA Medical Request for Full Remote Work - Accommodation Certificate Form Attached (PII)-Privileged and confidential; utf-8'Fwd%3A%20Ashley%20Gjovik%5F293492%20%E2%80%93%20Action%20Required%3A%20Review%20Accommodation%20Request.emi	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy, and in anticipation of litigation.

Glenk v. Apple  
Case No. 23-cv-4597-EMC  
Apple, Inc. Privilege Log

Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
147		2021-07-20 to 2021-08-07	<b>Perez, Isela</b> ; <b>Rubenstein, Debra</b> ; Waibel, Jenna; Jain, Antone	<b>Rubenstein, Debra</b> ; Waibel, Jenna; Jain, Antone; Polkes, Helen; Okpo, Ekelemchi; <b>Perez, Isela</b>	Email	13	Re: Privileged & Confidential- Meeting notes from 7/7/21	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
148		2021-08-07 to 2021-08-08	Warner, Adelmise; <b>Rice, Debbie</b> ; <b>Perez, Isela</b>	<b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Reicher, Joni; Warner, Adelmise; Okpo, Ekelemchi	Email	2	Re: Privileged and Confidential - AG Twitter Posts	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
149		2021-08-05 to 2021-08-09	Okpo, Ekelemchi; Reicher, Joni; Warner, Adelmise; <b>Perez, Isela</b> ; <b>Rice, Debbie</b>	Warner, Adelmise; <b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Reicher, Joni; Okpo, Ekelemchi	Email	3	Re: ACP - draft issue confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
150		2021-08-10	Jain, Antone	Jain, Antone; <b>Rubenstein, Debra</b> ; Polkes, Helen; <b>Perez, Isela</b> ; Waibel, Jenna; Thomas, Robert	Calendar File	2	SD01 check in	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
151		2021-07-20 to 2021-08-10	Waibel, Jenna; Jain, Antone; <b>Rubenstein, Debra</b> ; <b>Perez, Isela</b>	Jain, Antone; <b>Rubenstein, Debra</b> ; <b>Perez, Isela</b> ; Polkes, Helen; Okpo, Ekelemchi; Waibel, Jenna	Email	15	Re: Privileged & Confidential- Meeting notes from 7/7/21	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
152		2021-08-09 to 2021-08-10	Polkes, Helen; Jain, Antone; <b>Rubenstein, Debra</b> ; <b>Perez, Isela</b>	Jain, Antone; <b>Rubenstein, Debra</b> ; <b>Perez, Isela</b> ; Waibel, Jenna; Polkes, Helen	Email	3	Re: Privileged and confidential	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
153		2021-08-09 to 2021-08-10	<b>Rice, Debbie</b> ; Reicher, Joni; <b>Perez, Isela</b> ; <b>Rubenstein, Debra</b>	<b>Perez, Isela</b> ; <b>Rubenstein, Debra</b> ; Reicher, Joni; <b>Rice, Debbie</b>	Email	3	Re: AG/EPA on site visit 8/19 privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
154		2021-08-12	<b>Rice, Debbie</b>	<b>Rice, Debbie</b> ; Waldo, Jen; Reicher, Joni	Calendar File	1	External investigator/AG	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
155		2021-08-12	Reicher, Joni	<b>Rice, Debbie</b> ; Waldo, Jen; Reicher, Joni	Calendar File	1	External Investigator/AG	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
156		2021-08-10 to 2021-08-14	Reicher, Joni; Low, Stella	Low, Stella; Warner, Adelmise; <b>Rice, Debbie</b> ; Reicher, Joni	Email	2	Re: Attorney client privileged - timing of Issue confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
157		2021-08-13 to 2021-08-14	Reicher, Joni; <b>Rice, Debbie</b> ; Warner, Adelmise	<b>Rice, Debbie</b> ; Warner, Adelmise; Reicher, Joni	Email with attachments	3	Re: Confidential and Privileged: AG; IMG_6329.PNG	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
158		2021-08-13 to 2021-08-14	Reicher, Joni; <b>Rice, Debbie</b> ; Warner, Adelmise	<b>Rice, Debbie</b> ; Warner, Adelmise; Reicher, Joni	Email with attachments	3	Re: Confidential and Privileged: AG; image0.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
159		2021-08-14 to 2021-08-15	Warner, Adelmise; Reicher, Joni	Reicher, Joni; <b>Rice, Debbie</b> ; Warner, Adelmise	Email	2	Re: Employees/witnesses	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
160		2021-08-14 to 2021-08-15	Reicher, Joni; <b>Rice, Debbie</b> ; <b>Adams, Kate</b> ; Rosenstock, Josh	<b>Adams, Kate</b> ; O'Brien, Deirdre; <b>Rice, Debbie</b> ; Warner, Adelmise; Waldo, Jen; Reicher, Joni; Low, Stella; Huguet, Kristin; <b>Perez, Isela</b> ; Tully, Rachel; Holter, Heidi	Email	3	Re: ER update-privileged and confidential (AG)	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
161		2021-08-15	O'Brien, Deirdre; Reicher, Joni	Reicher, Joni; <b>Adams, Kate</b> ; <b>Rice, Debbie</b> ; Warner, Adelmise; <b>Perez, Isela</b> ; O'Brien, Deirdre	Email with attachments	6	Re: ATTORNEY CLIENT PRIVILEGED: Issue Confirmation; DRAFT talking points - AG EE, Witnesses .pages; Confirmation of Issues copy v2 8.9.21.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.

Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
162		2021-08-15	Reicher, Joni; <b>Adams, Kate</b> ; O'Brien, Deirdre	<b>Adams, Kate</b> ; O'Brien, Deirdre; <b>Rice, Debbie</b> ; Warner, Adelmise; <b>Perez, Isela</b> ; Reicher, Joni	Email	2	Re: ATTORNEY CLIENT PRIVILEGED: Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
163		2021-08-16	Reicher, Joni	Warner, Adelmise; <b>Rice, Debbie</b> ; Waldo, Jen; Reicher, Joni	Calendar File	1	ACP AG sync	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
164		2021-08-16	<b>Rice, Debbie</b>	<b>Adams, Kate</b> ; O'Brien, Deirdre; Waldo, Jen; Reicher, Joni; Warner, Adelmise; Huguet, Kristin; <b>Perez, Isela</b>	Email	1	AG issue confirmation/ready to send	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
165		2021-08-17	Warner, Adelmise		Document	2	Talking Points - PBPs and ER (8.16.21).pdf	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations, and the termination of Plaintiff's employment, performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
166		2021-08-17	Warner, Adelmise; Okpo, Ekelemchi	Okpo, Ekelemchi; Reicher, Joni; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Warner, Adelmise	Email	3	Re: APPLE CONFIDENTIAL: Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
167		2021-08-17	Reicher, Joni; Okpo, Ekelemchi	Okpo, Ekelemchi; Warner, Adelmise; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Reicher, Joni	Email	3	Re: APPLE CONFIDENTIAL: Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
168		2021-08-17	Warner, Adelmise; Okpo, Ekelemchi	Okpo, Ekelemchi; Reicher, Joni; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; <b>Perry, Jessica R.</b> ; Warner, Adelmise	Email	4	Re: ACP: Fwd: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
169		2021-08-16 to 2021-08-17	Reicher, Joni; Waibel, Jenna	Waibel, Jenna; Warner, Adelmise; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; <b>Rubenstein, Debra</b> ; Reicher, Joni	Email	5	Re: Privileged & Confidential-- meeting notes with AG from 7/7/2021	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
170		2021-08-16 to 2021-08-17	Waibel, Jenna; Warner, Adelmise; Reicher, Joni	Warner, Adelmise; Reicher, Joni; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; <b>Rubenstein, Debra</b> ; Waibel, Jenna	Email	5	Re: Privileged & Confidential-- meeting notes with AG from 7/7/2021	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
171		2021-08-16 to 2021-08-17	Waibel, Jenna; <b>Rubenstein, Debra</b> ; <b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Warner, Adelmise; Reicher, Joni	<b>Rubenstein, Debra</b> ; <b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Warner, Adelmise; Reicher, Joni; Waibel, Jenna; Johnson, Carl; Schmidt, Elizabeth; Jain, Antone; Waibel, Jenna	Email	7	Re: Privileged & Confidential-- meeting notes with AG from 7/7/2021	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
172		2021-08-16 to 2021-08-17	Warner, Adelmise; <b>Rice, Debbie</b> ; Waibel, Jenna; Reicher, Joni	Waibel, Jenna; Reicher, Joni; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; <b>Rubenstein, Debra</b> ; Warner, Adelmise	Email	5	Re: Privileged & Confidential-- meeting notes with AG from 7/7/2021	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
173		2021-08-16 to 2021-08-17	<b>Rubenstein, Debra</b> ; Waibel, Jenna; <b>Rice, Debbie</b> ; Warner, Adelmise; Reicher, Joni	Waibel, Jenna; <b>Rice, Debbie</b> ; Warner, Adelmise; Reicher, Joni; <b>Perez, Isela</b> ; <b>Rubenstein, Debra</b>	Email	6	Re: Privileged & Confidential-- meeting notes with AG from 7/7/2021	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
174		2021-08-16	Warner, Adelmise; Reicher, Joni; Waibel, Jenna	Reicher, Joni; Waibel, Jenna; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; <b>Rubenstein, Debra</b> ; Warner, Adelmise	Email	4	Re: Privileged & Confidential-- meeting notes with AG from 7/7/2021	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
175		2021-08-17	<b>Rice, Debbie</b> ; Reicher, Joni; Okpo, Ekelemchi	Reicher, Joni; Warner, Adelmise; <b>Perez, Isela</b> ; <b>Rice, Debbie</b>	Email	4	Re: APPLE CONFIDENTIAL: Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.



Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
176		2021-08-17	Warner, Adelmise; <b>Rice, Debbie</b> ; Reicher, Joni; Okpo, Ekelemchi	<b>Rice, Debbie</b> ; Reicher, Joni; <b>Perez, Isela</b> ; Okpo, Ekelemchi; Warner, Adelmise	Email	3	Re: APPLE CONFIDENTIAL: Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
177		2021-08-17	Okpo, Ekelemchi; Reicher, Joni; <b>Perez, Isela</b> ; Warner, Adelmise; <b>Perry, Jessica</b>	Reicher, Joni; <b>Perez, Isela</b> ; Warner, Adelmise; <b>Rice, Debbie</b> ; <b>Perry, Jessica</b> R.; Okpo, Ekelemchi	Email	5	Re: ACP: Response to AG's 8/16 email	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
178		2021-08-18	Warner, Adelmise; Okpo, Ekelemchi	Okpo, Ekelemchi; Reicher, Joni; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Warner, Adelmise	Email	5	Re: APPLE CONFIDENTIAL: Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
179		2021-08-18	Waibel, Jenna	Schmidt, Elizabeth; <b>Rubenstein, Debra</b>	Email	4	Meeting notes for 7/7/21 meeting with Ashley Gjovik	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
180		2021-08-18 to 2021-08-19	Okpo, Ekelemchi; <b>Rice, Debbie</b>	<b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Warner, Adelmise; Reicher, Joni; Okpo, Ekelemchi	Email	2	Re: ACP Data Request	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
181		2021-08-19 to 2021-08-20	Warner, Adelmise; Okpo, Ekelemchi	Okpo, Ekelemchi; Reicher, Joni; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Warner, Adelmise	Email	4	Re: ACP - Fwd: Welcome and Prep Work   AU Race & Justice	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
182		2021-08-20	Okpo, Ekelemchi	Warner, Adelmise; <b>Rice, Debbie</b>	Email with attachments	3	ACP: APPROVAL REQUEST: Backup Collection and Email/Communications Preservation; Backup preserve.numbers	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
183		2021-08-19 to 2021-08-20	Warner, Adelmise; Okpo, Ekelemchi	Okpo, Ekelemchi; Reicher, Joni; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Warner, Adelmise	Email	4	Re: ACP - Fwd: Welcome and Prep Work   AU Race & Justice	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
184		2021-08-20	Okpo, Ekelemchi	Reicher, Joni; Warner, Adelmise; <b>Rice, Debbie</b> ; <b>Perez, Isela</b>	Email	4	ACP Fwd: Welcome and Prep Work   AU Race & Justice	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
185		2021-08-20	Warner, Adelmise; <b>Rice, Debbie</b> ; Okpo, Ekelemchi	<b>Rice, Debbie</b> ; Reicher, Joni; <b>Perez, Isela</b> ; Warner, Adelmise	Email	4	Re: :DRAFT REPLY...Fwd: ACP: Fwd: Welcome and Prep Work   AU Race & Justice	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
186		2021-08-20	Warner, Adelmise; <b>Rice, Debbie</b> ; Okpo, Ekelemchi	<b>Rice, Debbie</b> ; Reicher, Joni; <b>Perez, Isela</b> ; Warner, Adelmise	Email	5	Re: ACP: Fwd: Welcome and Prep Work   AU Race & Justice	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
187		2021-08-20	<b>Rice, Debbie</b> ; Okpo, Ekelemchi	Reicher, Joni; Warner, Adelmise; <b>Perez, Isela</b> ; <b>Rice, Debbie</b>	Email	4	Re: ACP: Fwd: Welcome and Prep Work   AU Race & Justice	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
188		2021-08-14 to 2021-08-20	Reicher, Joni; Tulley, Rachel; Warner, Adelmise; <b>Rice, Debbie</b> ; Low, Stella; O'Brien, Deirdre; Rosenstock, Josh	<b>Rice, Debbie</b> ; O'Brien, Deirdre; <b>Adams, Kate</b> ; Warner, Adelmise; Low, Stella; Rosenstock, Josh; Huguet Quayle, Kristin; Waldo, Jen; <b>Perez, Isela</b> ; Tulley, Rachel; Reicher, Joni	Email with attachments	7	Fwd: ER update-privileged and confidential (AG issue confirmation/next steps); PastedGraphic-46.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
189		2021-08-14 to 2021-08-20	<b>Rice, Debbie</b> ; Reicher, Joni; Tulley, Rachel; Warner, Adelmise; Low, Stella; O'Brien, Deirdre; Rosenstock, Josh	Reicher, Joni; O'Brien, Deirdre; <b>Adams, Kate</b> ; Warner, Adelmise; Low, Stella; Rosenstock, Josh; Huguet Quayle, Kristin; Waldo, Jen; <b>Perez, Isela</b> ; Tulley, Rachel; <b>Rice, Debbie</b>	Email	6	Re: ER update-privileged and confidential (AG issue confirmation/next steps)	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
190		2021-08-19 to 2021-08-20	<b>Perez, Isela</b> ; Reicher, Joni; Warner, Adelmise; <b>Rice, Debbie</b> ; Farah, Dori	Warner, Adelmise; <b>Rice, Debbie</b> ; Reicher, Joni; Waldo, Jen; <b>Perez, Isela</b>	Email	3	Re: Privileged and Confidential - AG - PSQ Employee	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.

Gjovik v. Apple  
Case No. 23-cv-4597-EMC  
Apple, Inc. Privilege Log

Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
191		2021-08-20 to 2021-08-21	<b>Rice, Debbie</b> ; Warner, Ademise; Okpo, Ekelemchi	Warner, Ademise; Reicher, Joni; <b>Perez, Isela</b> ; <b>Rice, Debbie</b>	Email	5	Re: :DRAFT REPLY.....Fwd: ACP: Fwd: Welcome and Prep Work   AU Race & Justice	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
192		2021-08-20 to 2021-08-21	Warner, Ademise; <b>Rice, Debbie</b> ; Okpo, Ekelemchi; Reicher, Joni	Reicher, Joni; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Warner Ademise; Reicher, Joni	Email	5	Re: :DRAFT REPLY.....Fwd: ACP: Fwd: Welcome and Prep Work   AU Race & Justice	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
193		2021-08-20 to 2021-08-21	Reicher, Joni; <b>Rice, Debbie</b> ; Warner, Ademise; Okpo, Ekelemchi	<b>Rice, Debbie</b> ; Warner, Ademise; <b>Perez, Isela</b> ; Reicher, Joni	Email	5	Re: :DRAFT REPLY.....Fwd: ACP: Fwd: Welcome and Prep Work   AU Race & Justice	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
194		2021-08-21	<b>Rice, Debbie</b>	Okpo, Ekelemchi; Reicher, Joni; Warner, Ademise; <b>Perez, Isela</b>	Email	1	Response to AG-privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
195		2021-08-14 to 2021-08-22	<b>Rice, Debbie</b> ; Reicher, Joni; Tulley, Rachel; Warner, Ademise; Low, Stella; O'Brien, Deirdre; Rosenstock, Josh	Reicher, Joni; O'Brien, Deirdre; <b>Adams, Kate</b> ; Warner, Ademise; Low, Stella; Rosenstock, Josh; Huguet Quayle, Kristin; Waldo, Jen; <b>Perez, Isela</b> ; Tulley, Rachel; <b>Rice, Debbie</b>	Email	8	Re: ER update-privileged and confidential (AG issue confirmation/next steps)	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
196		2021-08-14 to 2021-08-22	<b>Rice, Debbie</b> ; Reicher, Joni; Tulley, Rachel; Warner, Ademise; Low, Stella; O'Brien, Deirdre; Rosenstock, Josh	Reicher, Joni; O'Brien, Deirdre; <b>Adams, Kate</b> ; Warner, Ademise; Low, Stella; Rosenstock, Josh; Huguet Quayle, Kristin; Waldo, Jen; <b>Perez, Isela</b> ; Tulley, Rachel; <b>Rice, Debbie</b>	Email	7	Re: ER update-privileged and confidential (AG issue confirmation/next steps)	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
197		2021-08-23	Waibel, Jenna		Document	11	A. Gjovik Interview Notes.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
198		2021-08-23	Okpo, Ekelemchi		Document	6	Helen Polkes - 8.23.21 Interview .pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
199		2021-08-23	Reicher, Joni; <b>Rice, Debbie</b> ; Okpo, Ekelemchi	<b>Rice, Debbie</b> ; Warner, Ademise; <b>Perez, Isela</b> ; Reicher, Joni	Email	5	Re: ACP - Fwd: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
200		2021-08-23	Warner, Ademise; Waibel, Jenna	Waibel, Jenna; <b>Rice, Debbie</b> ; Reicher, Joni; <b>Perez, Isela</b> ; Warner, Ademise	Email with attachments	23	Re: Privileged & Confidential--Fwd: Ashley Gjovik/Dan - 4/29 Meeting Notes; A. Gjovik Interview Notes.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
201		2021-08-23	Okpo, Ekelemchi	Reicher, Joni; Warner, Ademise; <b>Rice, Debbie</b> ; <b>Perez, Isela</b>	Email	4	ACP - Fwd: Welcome and Prep Work   AU Race & Justice	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
202		2021-08-23	Warner, Ademise; Reicher, Joni; Okpo, Ekelemchi	Reicher, Joni; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Okpo, Ekelemchi; Warner, Ademise	Email	5	Re: ACP - Fwd: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
203		2021-08-23	Warner, Ademise; <b>Perez, Isela</b> ; Reicher, Joni; Okpo, Ekelemchi	<b>Perez, Isela</b> ; Reicher, Joni; <b>Rice, Debbie</b> ; Warner, Ademise	Email	6	Re: ACP JR Follow up questions Fwd: ACP - Fwd: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
204		2021-08-23	Okpo, Ekelemchi; Reicher, Joni	Reicher, Joni; Warner, Ademise; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Okpo, Ekelemchi	Email	1	Re: ACP AG Timeline	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
205		2021-08-24	Okpo, Ekelemchi		Spreadsheet	1	AG_INC080053657_Peer_Feedback.xlsx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.

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206		2021-08-23 to 2021-08-24	Okpo, Ekelemchi; Warner, Adelmise; <b>Rice, Debbie</b>	Warner, Adelmise; <b>Rice, Debbie</b> ; Reicher, Joni; <b>Perez, Isela</b> ; Okpo, Ekelemchi	Email	7	Re: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
207		2021-08-24	<b>Rice, Debbie</b> ; Okpo, Ekelemchi	Okpo, Ekelemchi; Reicher, Joni; Warner, Adelmise; <b>Perez, Isela</b> ; <b>Rice, Debbie</b>	Email	6	Re: ACP - Fwd: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
208		2021-08-24	Okpo, Ekelemchi	Reicher, Joni; Warner, Adelmise; <b>Rice, Debbie</b> ; <b>Perez, Isela</b>	Email with attachments	13	Fwd: APPLE CONFIDENTIAL: Issue Confirmation	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
209		2021-08-23 to 2021-08-24	Warner, Adelmise; <b>Rice, Debbie</b> ; Okpo, Ekelemchi	<b>Rice, Debbie</b> ; Warner, Adelmise	Email	7	Re: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
210		2021-08-24 to 2021-08-25	Warner, Adelmise; <b>Rice, Debbie</b>	<b>Rice, Debbie</b> ; Reicher, Joni; Waldo, Jen; Warner, Adelmise	Email	5	Re: AG Historical Peer feedback for legal matter-privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
211		2021-08-23 to 2021-08-25	Okpo, Ekelemchi; Warner, Adelmise; <b>Rice, Debbie</b> ; <b>Perry, Jessica</b>	Warner, Adelmise; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Okpo, Ekelemchi; <b>Graham, Lara</b>	Email	2	Re: Gjovik - Chart of Witnesses and Claims	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
212		2021-08-26	Okpo, Ekelemchi		Document	10	Dan West - 8:26:21 Interview .pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
213		2021-08-14 to 2021-08-26	Huguet, Kristin; Waldo, Jen; Tulley, Rachel; Reicher, Joni; Warner, Adelmise; <b>Rice, Debbie</b> ; Low, Stella; Rosenstock, Josh; O'Brien, Deirdre	O'Brien, Deirdre; <b>Adams, Kate</b> ; Waldo, Jen; Marker-Ok, Kym; Warner, Adelmise; <b>Rice, Debbie</b> ; Low, Stella; Rosenstock, Josh; <b>Perez, Isela</b> ; Tulley, Rachel; Reicher, Joni; Raspe, Kristina; Huguet, Kristin	Email with attachments	13	Re: ER update-privileged and confidential (AG issue confirmation/next steps); PastedGraphic-2.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
214		2021-08-26	<b>Rice, Debbie</b> ; Warner, Adelmise; Huguet, Kristin	<b>Rice, Debbie</b> ; Waldo, Jen; Reicher, Joni; Low, Stella; Whyte, Barbara; Loewe, Dylan; Rubin, Isaac	Email	5	Fwd: The Information - Apple Was the Most Secretive Company in Tech. Then it Developed a Slack Habit.	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
215		2021-08-26	Waldo, Jen	O'Brien, Deirdre; <b>Adams, Kate</b> ; <b>Rice, Debbie</b> ; Reicher, Joni; Warner, Adelmise; Marker-Ok, Kym; Quayle, Kristin Huguet; Holter, Heidi; Waldo, Jen	Email	5	ACP Slack Updates   08.26.21	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
216		2021-08-25 to 2021-08-26	Okpo, Ekelemchi; <b>Rice, Debbie</b> ; <b>Perry, Jessica</b>	<b>Rice, Debbie</b> ; Warner, Adelmise; Reicher, Joni; <b>Perez, Isela</b> ; Okpo, Ekelemchi; <b>Graham, Lara</b>	Email with attachments	4	Re: Gjovik - Chart of Witnesses and Claims With Gjovik Revisions; Chart of Witnesses and Claims 4154-1082-1425 3.xlsx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
217		2021-08-25 to 2021-08-26	Okpo, Ekelemchi; <b>Rice, Debbie</b> ; Warner, Adelmise	<b>Rice, Debbie</b> ; Reicher, Joni; Warner, Adelmise; <b>Perez, Isela</b> ; Okpo, Ekelemchi	Email	5	Re: ACP - Draft Revised Issue Confirmation	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
218		2021-08-26	Reicher, Joni	<b>Rice, Debbie</b>	Email with attachments	3	Draft ACP; Draft Exit Outcomes ACP.key	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
219		2021-08-27	Okpo, Ekelemchi	<b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Warner, Adelmise	Email	3	ACP - Search Request	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
220		2021-08-27	Warner, Adelmise; Okpo, Ekelemchi	Okpo, Ekelemchi; Reicher, Joni; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Warner, Adelmise	Email	6	Re: APPLE CONFIDENTIAL: Issue Confirmation	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.



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221		2021-08-26 to 2021-08-27	Okpo, Ekelemchi; <b>Perez, Isela; Rice, Debbie</b>	<b>Perez, Isela; Rice, Debbie</b> ; Warner, Adelmise; Okpo, Ekelemchi	Email	4	Re: ACP - Search Request	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
222		2021-08-16 to 2021-08-27	<b>Perez, Isela</b> ; Warner, Adelmise; <b>Rice, Debbie</b>	Warner, Adelmise; <b>Rice, Debbie; Perez, Isela</b>	Email with attachments	8	Re: Privileged and Confidential - AG Open Items (accommodations request); Privileged and Confidential Gjovik Accommodation Letter.docx	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy, and in anticipation of litigation.
223		2021-08-27 to 2021-08-28	<b>Polinsky, Melissa Marrus; Rice, Debbie</b>	<b>Rice, Debbie</b> ; Reicher, Joni; <b>Polinsky, Melissa</b>	Email	4	Re: [TIME SENSITIVE] Request for comment from The Verge	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
224		2021-08-28	<b>Polinsky, Melissa Marrus</b>	<b>Rice, Debbie</b> ; Reicher, Joni	Email	3	Fwd: [TIME SENSITIVE] Request for comment from The Verge	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
225		2021-08-14 to 2021-08-29	<b>Rice, Debbie</b> ; Huguet, Kristin; Waldo, Jen; Tulley, Rachel; Reicher, Joni; Warner, Adelmise; Low, Stella; O'Brien, Deirdre; Rosenstock, Josh	<b>Perry, Jessica</b> ; Warner, Adelmise; <b>Perez, Isela</b> ; Huguet, Kristin; O'Brien, Deirdre; <b>Adams, Kate</b> ; Waldo, Jen; Marker-ok, Kym; Warner, Adelmise; <b>Rice, Debbie</b> ; Low, Stella; Rosenstock, Josh; Tulley, Rachel; Reicher, Joni; Raspe, Kristina	Email with attachments	42	Re: Coverage Summary - employee issues on social and in media; Social Media and Online Communications   People.pdf	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
226		2021-08-30	Okpo, Ekelemchi		Document	3	Mike Ertell - 8:30:21 Interview .pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
227		2021-08-30	Waibel, Jenna	Jain, Antone; Johnson, Carl; <b>Rubenstein, Debra</b> ; Polkes, Helen; <b>Perez, Isela</b> ; Waibel, Jenna; Thomas, Robert	Calendar File	1	EHS/ AG Follow up sync	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
228		2021-08-14 to 2021-08-30	Waldo, Jen; Huguet, Kristin; Tulley, Rachel; Reicher, Joni; Warner, Adelmise; <b>Rice, Debbie</b> ; Low, Stella; O'Brien, Deirdre; Rosenstock, Josh	Quayle, Kristin Huguet; Waldo, Jen; O'Brien, Deirdre; <b>Adams, Kate</b> ; Marker-Ok, Kym; Warner, Adelmise; <b>Rice, Debbie</b> ; Low, Stella; Rosenstock, Josh; <b>Perez, Isela</b> ; Tulley, Rachel; Reicher, Joni; Whye, Barbara	Email with attachments	16	Re: Coverage Summary - employee issues on social and in media; PastedGraphic-73.png; 552c159b-b0c5-46fd-800e-8d891892b6fc.png; PastedGraphic-6.png; PastedGraphic-76.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
229		2021-08-30	Reicher, Joni; <b>Rice, Debbie</b>	<b>Rice, Debbie</b> ; Quayle, Kristin Huguet; Sainz, Fred; Reicher, Joni	Email	6	Re: Additional info re iCloud@Apple	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
230		2021-08-26 to 2021-08-30	Okpo, Ekelemchi; Warner, Adelmise; <b>Perez, Isela; Rice, Debbie</b>	Warner, Adelmise; <b>Perez, Isela; Rice, Debbie</b> ; Okpo, Ekelemchi	Email	5	Re: ACP - Search Request	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
231		2021-08-30 to 2021-08-31	Waldo, Jen; O'Brien, Deirdre; McLeod, Eddie	O'Brien, Deirdre; Waldo, Jen; <b>Adams, Kate; Rice, Debbie</b> ; Reicher, Joni; Quayle, Kristin Huguet; Marker-Ok, Kym; Warner, Adelmise; Waldo, Jen	Email	8	Re: ACP Slack Updates   08.30.21	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
232		2021-08-30 to 2021-08-31	<b>Adams, Kate</b> ; O'Brien, Deirdre; Waldo, Jen; McLeod, Eddie	O'Brien, Deirdre; Waldo, Jen; <b>Rice, Debbie</b> ; Reicher, Joni; Quayle, Kristin Huguet; Marker-Ok, Kym; Warner, Adelmise	Email	8	Re: ACP Slack Updates   08.30.21	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
233		2021-08-20 to 2021-08-31	Polkes, Helen; <b>Perez, Isela</b> ; Johnson, Carl; <b>Rubenstein, Debra</b> ; Waibel, Jenna; Jain, Antone	<b>Perez, Isela</b> ; Johnson, Carl; <b>Rubenstein, Debra</b> ; Waibel, Jenna; Jain, Antone; Thomas, Robert; Polkes, Helen	Email	6	Re: SD01 - upcoming EHS meeting w employee - [Privileged & Confidential- attorney work product]	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
234		2021-08-20 to 2021-08-31	<b>Rubenstein, Debra</b> ; Polkes, Helen; Jain, Antone; Waibel, Jenna; <b>Perez, Isela</b>	Polkes, Helen; Johnson, Carl; Thomas, Robert; Jain, Antone; <b>Perez, Isela</b> ; Waibel, Jenna; <b>Rubenstein, Debra</b>	Email	5	Re: SD01 - upcoming EHS meeting w employee - [Privileged & Confidential- attorney work product]	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
235		2021-08-20 to 2021-08-31	Polkes, Helen; Waibel, Jenna; <b>Rubenstein, Debra</b> ; Jain, Antone; <b>Perez, Isela</b>	Waibel, Jenna; <b>Perez, Isela</b> ; Jain, Antone; Thomas, Robert; Johnson, Carl; <b>Rubenstein, Debra</b> ; Polkes, Helen	Email	6	Re: SD01 - upcoming EHS meeting w employee - [Privileged & Confidential- attorney work product]	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.

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236		2021-08-31 to 2021-09-01	Warner, Adelmise; <b>Rice, Debbie</b> ; Emery, Kathleen	<b>Rice, Debbie; Perez, Isela</b> ; Warner, Adelmise	Email	2	Re: Ashley Gjovik. Case HRC000019497 (complaint re ear scan invitation)	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
237		2021-08-31 to 2021-09-01	<b>Rice, Debbie</b> ; Emery, Kathleen	Warner, Adelmise; <b>Perez, Isela; Rice, Debbie</b>	Email	3	Fwd: Ashley Gjovik. Case HRC000019497 (complaint re ear scan invitation)	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
238		2021-08-31 to 2021-09-01	<b>Rice, Debbie</b> ; Emery, Kathleen	Emery, Kathleen; Warner, Adelmise; <b>Rice, Debbie</b>	Email	1	Re: Ashley Gjovik. Case HRC000019497	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
239		2021-09-02	Polkes, Helen	Jain, Antone; Johnson, Carl; <b>Rubenstein, Debra</b> ; Polkes, Helen; <b>Perez, Isela</b> ; Waibel, Jenna; Thomas, Robert	Calendar File	1	EHS/ AG Follow up sync	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
240		2021-07-20 to 2021-09-02	Jain, Antone; Waibel, Jenna; <b>Perez, Isela</b> ; Polkes, Helen; <b>Rubenstein, Debra</b>	Waibel, Jenna; <b>Perez, Isela; Rubenstein, Debra</b> ; Polkes, Helen; Okpo, Ekelemchi; Jain, Antone; Johnson Carl; Thomas, Robert	Email	16	Re: Privileged & Confidential- Meeting notes from 7/7/21	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
241		2021-09-01 to 2021-09-02	Warner, Adelmise; <b>Perez, Isela; Rice, Debbie</b>	<b>Perez, Isela; Rice, Debbie</b> ; Warner, Adelmise	Email	3	Re: Wiping of Device Qs related to A.G.	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
242		2021-09-01 to 2021-09-02	<b>Rice, Debbie</b> ; Warner, Adelmise; <b>Perez, Isela</b> ; Reicher, Joni; Temus, John	Warner, Adelmise; <b>Perez, Isela; Reicher, Joni; Rice, Debbie</b>	Email	3	Re: Internal application	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
243		2021-09-03	Waldo, Jen	O'Brien, Deirdre; <b>Adams, Kate</b> ; Quayle, Kristin Huguet; <b>Rice, Debbie</b> ; Reicher, Joni; Warner, Adelmise; Marker-Ok, Kym; Whye, Barbara; Holter, Heidi	Email	12	ACP Slack Updates   09.03.21	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
244		2021-09-03	Warner, Adelmise; <b>Rice, Debbie</b> ; Okpo, Ekelemchi; Reicher, Joni	<b>Rice, Debbie</b> ; Reicher, Joni; <b>Perez, Isela</b> ; Warner, Adelmise; Huguet, Kristin; Waldo, Jen	Email with attachments	8	Re: ACP - Fwd: Meeting Request; PastedGraphic-1.png; Screenshot 2021-09-03 at 2.58.06 PM.png; image.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
245		2021-09-03	Okpo, Ekelemchi	Reicher, Joni; Warner, Adelmise; <b>Rice, Debbie; Perez, Isela</b>	Email with attachments	5	ACP - Fwd: Meeting Request; PastedGraphic-1.png	Attorney Client Privilege	Attorney-client privileged documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
246		2021-09-02 to 2021-09-03	Warner, Adelmise; Reicher, Joni; Okpo, Ekelemchi	Okpo, Ekelemchi; Reicher, Joni; <b>Rice, Debbie; Perez, Isela</b> ; Warner, Adelmise	Email	3	Re: ACP: Prep for AG Follow up	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
247		2021-09-02 to 2021-09-03	Okpo, Ekelemchi; Warner, Adelmise; Reicher, Joni	Warner, Adelmise; Reicher, Joni; <b>Rice, Debbie; Perez, Isela</b> ; Okpo, Ekelemchi	Email	2	Re: ACP: Prep for AG Follow up	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
248		2021-09-02 to 2021-09-03	Reicher, Joni; Warner, Adelmise; <b>Perez, Isela; Rice, Debbie</b> ; Okpo, Ekelemchi	Warner, Adelmise; <b>Perez, Isela; Rice, Debbie</b> ; Reicher, Joni; Okpo, Ekelemchi	Email	3	Re: ACP: Prep for AG Follow up	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
249		2021-09-02 to 2021-09-03	Reicher, Joni; <b>Perez, Isela; Rice, Debbie</b> ; Warner, Adelmise; Okpo, Ekelemchi	<b>Perez, Isela; Rice, Debbie</b> ; Warner, Adelmise; Reicher, Joni; Okpo, Ekelemchi	Email	2	Re: ACP: Prep for AG Follow up	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
250		2021-09-02 to 2021-09-03	<b>Rice, Debbie</b> ; Reicher, Joni; Warner, Adelmise; <b>Perez, Isela</b> ; Okpo, Ekelemchi	Reicher, Joni; Warner, Adelmise; <b>Perez, Isela</b> ; Okpo, Ekelemchi; <b>Rice Debbie</b>	Email	3	Re: ACP: Prep for AG Follow up	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.

Gjovik v. Apple  
Case No. 23-cv-4597-EMC  
Apple, Inc. Privilege Log

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251		2021-09-02 to 2021-09-03	Rice, Debbie; Warner, Adelmise; Reicher, Joni; Okpo, Ekelemchi	Warner, Adelmise; Reicher, Joni; Perez, Isela; Okpo, Ekelemchi; Rice, Debbie	Email	2	Re: ACP: Prep for AG Follow up	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
252		2021-09-07	Okpo, Ekelemchi		Document	4	ACP AG Investigation summary key issues .numbers	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
253		2021-096-03 to 2021-09-07	Warner, Adelmise; Reicher, Joni; Okpo, Ekelemchi	Reicher, Joni; Rice, Debbie; Perez, Isela; Warner, Adelmise	Email	5	Re: ACP - Fwd: Meeting Request	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
254		2021-09-07	Adams, Kate; Rosenstock, Josh	Rosenstock, Josh; Rice, Debbie; O'Brien, Deirdre; Whye, Barbara; Low, Stella; Reicher, Joni; Quayle, Kristin Huguet; Waldo, Jen; Marker-Ok, Kym; Holter, Heidi; Acevedo, Diego; Warner, Adelmise	Email	2	Re: CNBC segment and additional tweets	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
255		2021-09-01 to 2021-09-07	Warner, Adelmise; Rice, Debbie; Polinsky, Melissa; Perez, Isela; Ternus, John	Rice, Debbie; Ferguson, James; Reicher, Joni; Perez, Isela; Warner, Adelmise; Bowman, Megan; Ternus, John; Polinsky, Melissa; DeMario, Tony	Email	5	Re: (AG) Fwd: Internal application (Glimmer/Gobble) privileged and confidential	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
256		2021-09-07 to 2021-09-08	Okpo, Ekelemchi; Rice, Debbie; Perry, Jessica	Rice, Debbie; Jessica Perry; Reicher, Joni; Warner, Adelmise; Perez, Isela; Okpo, Ekelemchi	Email	4	Re: Draft - Response to AG	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
257		2021-09-07 to 2021-09-08	Warner, Adelmise; Okpo, Ekelemchi	Okpo, Ekelemchi; Reicher, Joni; Rice, Debbie; Perez, Isela; Warner, Adelmise	Email	4	Re: ACP - Fwd: Meeting Request	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
258		2021-09-07 to 2021-09-08	Warner, Adelmise; Okpo, Ekelemchi	Okpo, Ekelemchi; Reicher, Joni; Rice, Debbie; Perez, Isela; Warner, Adelmise	Email	5	Re: Meeting Request	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
259		2021-09-08	Rice, Debbie; Warner, Adelmise	Emery, Kathleen; Warner, Adelmise; Rice Debbie	Email	1	Re: Ashley Gjovik Case HRC000045789	Attorney Client Privilege	Attorney-client privileged communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
260		2021-09-09	Warner, Adelmise	O'Brien, Deirdre; Adams, Kate; Rice, Debbie; Reicher, Joni; Waldo, Jen; Perez, Isela	Email	1	Confidential and Privileged: AG	Attorney Client Privilege	Attorney-client privileged communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
261		2021-09-09		Perez, Isela; Warner, Adelmise, Kagramanov, Aleks, Reicher, Joni	Messages with attachments	8	Direct message Adelmise Rosemè Warner, Aleks Kagramanov and 2 others - 2021-09-09 (UTC).pdf	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations, performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and the termination of Plaintiff's employment, reflecting legal advice and strategy.
262		2021-09-09	Okpo, Ekelemchi		Document	3	ACP - Investigation Summary A. Gjovik.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
263		2021-09-09	Bowman, Megan		Document	2	Privileged and Confidential - AG Term Letter DRAFT.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents prepared at the direction of legal counsel and reflecting attorney edits and mental impressions regarding the termination of Plaintiff's employment, and in anticipation of litigation.
264		2021-09-09	Reicher, Joni	Warner, Adelmise; Rice, Debbie; O'Brien, Deirdre; Okpo, Ekelemchi; Perez, Isela; Waldo, Jen; Reicher, Joni; Adams, Kate; Quayle, Kristin Huguet; Polinsky, Melissa; Jacobs, Sophi	Calendar File	2	Attorney client privileged - AG	Attorney Client Privilege	Attorney-client privileged communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
265		2021-07-20 to 2021-09-09	Waibel, Jenna; Rubenstein, Debra; Perez, Isela; Jain, Antone	Rubenstein, Debra; Perez, Isela; Jain, Antone; Polkes, Helen; Waibel, Jenna	Email	19	Re: Privileged & Confidential- Meeting notes from 7/7/21	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
266		2021-09-06 to 2021-09-09	Okpo, Ekelemchi; Warner, Adelmise	Warner, Adelmise; Reicher, Joni; Rice, Debbie; Perez, Isela; Okpo, Ekelemch	Email	2	Re: ACP - 9/8/21 draft response	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.

Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
267		2021-09-08 to 2021-09-09	Warner, Adelmise; Reicher, Joni; <b>Perez, Isela; Rice, Debbie</b> ; Okpo, Ekelemchi	Reicher, Joni; <b>Perez, Isela; Rice, Debbie</b> ; Warner, Adelmise	Email	4	Re: ACP - 9/8/21 draft response	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
268		2021-09-09	Reicher, Joni	O'Brien, Deirdre; <b>Adams, Kate</b> ; Warner, Adelmise; Waldo, Jen; <b>Perez, Isela; Rice, Debbie</b>	Email with attachments	2	ACP Investigation findings; ACP AG Executive Summary Keynote (9.9.21 Debrief).key	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
269		2021-09-09	Kagramanov, Aleks	O'Brien, Deirdre; Reicher, Joni; Warner, Adelmise; <b>Rice, Debbie; Perez, Isela</b>	Email with attachments	6	Re: AG Emails; Screen Shot 2021-09-09 at 3.56.31 PM.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
270		2021-09-09	Warner, Adelmise; Okpo, Ekelemchi	Okpo, Ekelemchi; Reicher, Joni; <b>Rice, Debbie; Perez, Isela</b> ; Warner, Adelmise	Email	6	Re: Meeting Request	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
271		2021-09-09	<b>Perez, Isela</b> ; Bertolus, Yannick; Waldo, Jen	Bertolus, Yannick; Bowman, Megan; Reicher, Joni; Warner, Adelmise; Waldo, Jen; <b>Perez, Isela</b>	Email with attachments	5	Re: Attorney Client Privileged   Term Letter; Privileged and Confidential - AG Term Letter DRAFT.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.
272		2021-09-09	Kagramanov, Aleks	DeMario, Tony; <b>Jacobs, Sophi</b>	Email with attachments	2	AG Intro Email Draft; AG Intro Email.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
273		2021-09-07 to 2021-09-09	Kagramanov, Aleks; Warner, Adelmise; <b>Perez, Isela; Rice, Debbie</b>	Warner, Adelmise; <b>Perez, Isela; Polinsky, Melissa Marrus; Rice, Debbie; Jacobs, Sophi</b> ; Kagramanov, Aleks	Email with attachments	20	Re: (AG) Fwd: Internal application (Glimmer/Gobler) privileged and confidential; AG Talking Points.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
274		2021-09-09	Reicher, Joni; Warner, Adelmise; <b>Perez, Isela</b>	Warner, Adelmise; <b>Perez, Isela; Rice, Debbie</b> ; Waldo, Jen; Reicher, Joni	Email	2	Re: ACP AG Security reach out	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
275		2021-09-08 to 2021-09-09	Reicher, Joni	<b>Jacobs, Sophi; Perez, Isela</b> ; Warner, Adelmise; <b>Rice, Debbie</b>	Email	1	Re: ACP meeting tomorrow	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
276		2021-09-09	<b>Rice, Debbie</b> ; Reicher, Joni; Warner, Adelmise; <b>Perez, Isela</b>	Reicher, Joni; Warner, Adelmise; <b>Perez, Isela</b> ; Waldo, Jen; <b>Rice, Debbie</b>	Email	2	Re: ACP AG Security reach out	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
277		2021-09-09	Warner, Adelmise; <b>Jacobs, Sophi</b>	<b>Jacobs, Sophi</b> ; Kagramanov, Aleks; <b>Perez, Isela</b> ; Reicher, Joni; Warner, Adelmise	Email with attachments	3	Re: Confidential and Privileged; utf-8"Ashley%20G%20C3%B8vk.vcf	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
278		2021-09-09	<b>Perez, Isela</b> ; Reicher, Joni; Bertolus, Yannick; Waldo, Jen	Reicher, Joni; Warner, Adelmise; <b>Perez, Isela</b> ; Bertolus, Yannick; Waldo, Jen	Email	2	Re: Attorney Client Privileged   Term Letter	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.
279		2021-09-08 to 2021-09-09	<b>Perez, Isela</b> ; Reicher, Joni; Warner, Adelmise; Okpo, Ekelemchi; <b>Rice, Debbie</b>	Reicher, Joni; Warner, Adelmise; <b>Rice, Debbie; Perez, Isela</b> ; Okpo, Ekelemchi	Email	4	Re: ACP - 9/8/21 draft response	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
280		2021-09-08 to 2021-09-09	<b>Perez, Isela</b> ; Reicher, Joni; Warner, Adelmise; <b>Rice, Debbie</b> ; Okpo, Ekelemchi	Reicher, Joni; Warner, Adelmise; <b>Rice, Debbie; Perez, Isela</b> ; Okpo, Ekelemchi	Email	4	Re: ACP - 9/8/21 draft response	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
281		2021-09-09	<b>Melissa Polinsky</b>	Reicher, Joni	Email	1	AG call	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.

Case No. 23-cv-4597-EMC  
Apple, Inc. Privilege Log

Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
282		2021-09-10	Rosenstock, Josh	O'Brien, Deirdre; <b>Adams, Kate</b> ; Low, Stella; Quayle, Kristin Huguet; <b>Rice, Debbie</b> ; Waldo, Jen; Marker-Ok, Kym; Reicher, Joni; Warner, Adelmise; <b>Perez, Isela</b> ; Whye, Barbara; Tulley, Rachel Wolf	Email with attachments	3	Coverage Summary - Fri Sept 10 - employee issues; PastedGraphic-3.png	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
283		2021-09-09 to 2021-09-10	Jenkinson, Christoph; Reicher, Joni; Ford, Donna	Reicher, Joni; <b>Perez, Isela</b> ; Warner, Adelmise; Jenkinson, Christoph	Email	4	Re: ACP Final pay request	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.
284		2021-09-09	Reicher, Joni;	Warner, Adelmise; Waldo, Jen; <b>Perez, Isela</b> ; <b>Rice, Debbie</b>	Email with attachments	6	ACP Action items DRAFT working document; ACP AG Actions 9.9.21.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
285		2021-09-10	Waldo, Jen	O'Brien, Deirdre; <b>Adams, Kate</b> ; Quayle, Kristin Huguet; <b>Rice, Debbie</b> ; Reicher, Joni; Warner, Adelmise; Marker-Ok, Kym; Whye, Barbara; Waldo, Jen	Email	9	ACP Slack & Twitter Updates   09.10.21 - 3 pm	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
286		2021-09-10	Waldo, Jen	<b>Adams, Kate</b> ; O'Brien, Deirdre; Quayle, Kristin Huguet; Reicher, Joni; Warner, Adelmise; Marker-Ok, Kym; Whye, Barbara; <b>Rice, Debbie</b> ; Waldo, Jen	Email	4	ACP Slack & Twitter Updates   @ 8AM PST 09.10.21	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.
287		2021-09-10	Warner, Adelmise; Bowman, Megan; <b>Rice, Debbie</b> ; Reicher, Joni; Waldo, Jen; Bertolus, Yannick	Bowman, Megan; <b>Rice, Debbie</b> ; Reicher, Joni; Waldo, Jen; <b>Perez, Isela</b>	Email	3	ATTORNEY CLIENT PRIVILEGED Re: Employment Status	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.
288		2021-09-10	Warner, Adelmise	Waldo, Jen; <b>Perez, Isela</b> ; Reicher, Joni	Email with attachments	3	Confidential and Privileged: IMG_7033.PNG; image0.png	Attorney Client Privilege	Attorney-client privileged communications prepared by employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.
289		2021-09-10	<b>Perez, Isela</b> ; Reicher, Joni	Reicher, Joni; Bowman, Megan; Warner, Adelmise; Waldo, Jen; <b>Rice, Debbie</b> ; <b>Perez, Isela</b>	Email with attachments	3	Re: ACP - Summary and final termination letter and attachments; GS ER AG Summary to Yannick 9.9.21 Final.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.
290		2021-09-10	Reicher, Joni	<b>Perez, Isela</b> ; Warner, Adelmise	Email with attachments	1	Final termination letter pdf and pages and Enclosures with the termination letter	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.
291		2021-09-09 to 2021-09-10	<b>Jacobs, Sophi</b> ; Warner, Adelmise; <b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Carroll, Sue	Warner, Adelmise; <b>Perez, Isela</b> ; <b>Rice, Debbie</b> ; Reicher, Joni; <b>Jacobs, Sophi</b> ; Carroll, Sue	Email with attachments	5	Re: Twitter TOUs [CD035452] Privileged & Confidential; Image from iOS.png	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.
292		2021-09-09 to 2021-09-10	Reicher, Joni; <b>Perez, Isela</b> ; <b>Jacobs, Sophi</b>	<b>Perez, Isela</b> ; Bowman, Megan; Reicher, Joni; <b>Rice, Debbie</b> ; DeMario, Tony	Email	1	Re: Privileged -- AG System Access	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.
293		2021-09-12	Okpo, Ekelemchi		Document	13	Summary of Allegations & Coaching .key	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
294		2021-09-12	Okpo, Ekelemchi		Document	5	ACP AG Executive Summary Keynote (9.9.21 Debrief) HW shared copy.key	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
295		2021-09-12	Okpo, Ekelemchi		Document	12	ACP Software Engineering Summary Keynote (9.10.21 Debrief) shared copy.key	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
296		2021-09-13	Okpo, Ekelemchi		Document	25	ACP HWE and SWE Summary 9.14.21.key	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
297		2021-09-14	Okpo, Ekelemchi		Document	24	ACP HWE and SWE Summary 9.14.21 Version 7:30AMTUES.key	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
298		2021-09-16	Jain, Antone	Jain, Antone; <b>Rubenstein, Debra</b> ; Schmidt, Elizabeth; Polkes, Helen; <b>Perez, Isela</b> ; Waibel, Jenna; <b>Matarrese, Kyle</b> ; Thomas, Robert	Calendar File	1	SD01 EHS comms	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.



Privilege Log No.	Bates No. or Range	Date(s) Represented	Author(s) or Sender(s)	Recipient(s) / Participant(s)	File Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection
299		2021-09-17	Okpo, Ekelemchi		Document	23	ACP - Investigation Summary A. Gjovik - Draft.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
300		2021-09-24	Okpo, Ekelemchi		Document	1	Closeout plan.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
301		2021-09-27	Okpo, Ekelemchi		Document	15	ACP - Investigation Summary A. Gjovik - Draft copy.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
302		2021-09-27	<b>Rice, Debbie</b>	Warner, Adelmise; <b>Rice, Debbie</b> ; Okpo, Ekelemchi; <b>Perez, Isela</b> ; <b>Perry, Jessica</b>	Calendar File	1	AG final investigation report discussion	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
303		2021-09-29	Okpo, Ekelemchi		Document	1	SWE Witness List.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
304		2021-09-29	Okpo, Ekelemchi		Document	15	ACP - Investigation Summary A. Gjovik - Draft copy 2.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
305		2021-10-01	Warner, Adelmise	<b>Perry, Jessica R.</b> ; <b>Rice, Debbie</b> ; <b>Perez, Isela</b> ; Okpo, Ekelemchi	Email with attachments	17	Confidential and Attorney-Client Privileged: Draft Investigation Summary (AG); ACP - Investigation Summary A. Gjovik - Draft copy 2.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
306		2021-10-05	<b>Perry, Jessica</b>		Document	16	Gjovik - Redlined Investigation Summary A. Gjovik - Draft copy 2.docx (JP Edits).pdf	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
307		2021-10-08	Okpo, Ekelemchi		Document	15	ACP - Investigation Summary A. Gjovik - Draft copy 3.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
308		2021-10-10	Okpo, Ekelemchi		Document	22	Investigation Summary Exhibits.key	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
309		2021-10-10	Okpo, Ekelemchi		Document	15	ACP - Investigation Summary A. Gjovik_September 2021 W:Comments.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
310		2021-10-10	Okpo, Ekelemchi		Document	15	ACP - Investigation Summary A. Gjovik_September 2021 .pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
311		2021-10-11	Okpo, Ekelemchi		Document	15	ACP - Investigation Summary A. Gjovik_September 2021 .pdf	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
312		2021-10-12	Okpo, Ekelemchi		Document	11	Powers - 8:25:21 Interview copy.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
313		2021-09-29 to 2021-10-12	<b>Perez, Isela</b> ; Okpo, Ekelemchi; Warner, Adelmise	Okpo, Ekelemchi; <b>Rice, Debbie</b> ; Warner, Adelmise; Reicher, Joni; <b>Perez, Isela</b>	Email	5	Re: ACP: Investigation Summary	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.
314		2021-10-27	Okpo, Ekelemchi		Document	1	ACP AG Investigation Timeline 9.1.21.pages	Attorney Client Privilege ; Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.

After a reasonable inquiry based on the documents and information available, we affirm that the documents and communications represented by this privilege log were intended to be handled with strict confidentiality, in compliance with section 20(f) of the Standing Order for Magistrate Judge Kandis A. Westmore. This includes storing documents in restricted locations accessible only to authorized personnel and disclosing communications solely to individuals authorized by legal counsel or acting under their direction.

Included Names:	Job Title	Business Group
<b>Acevedo, Diego</b>	Corporate Attorney Manager	Legal - HR
<b>Adams, Kate</b>	Sr.VP	Legal
Baylosis, Ed	Environ Hlth/Sfty Manager	Facilities
Bertolus, Yannick	SW QE Eng VP	Hardware
Bowman, Megan	HR Business Partner Director	BHR Hardware (R&D)
Carroll, Sue	Project/Prgm Manager	Trademark & Copyright
Creighton, Sue	Environ Hlth/Sfty Manager	Environ. Health & Safety US
DeBaene, Austin	Environ Hlth/Sfty Eng	Environ. Health & Safety US
DeMario, Tony	Global Security Manager	Investigations & Child Safety
Farah, Dori	HR Business Partner Manager	Hardware
Ferguson, James	Employee Relations Director	Employee Relations - US
Ford, Donna	Payroll Analyst	GBS GBL H2R
Gies, Timos	Project Manager	Compliance & Business Conduct
<b>Graham, Lara</b>	Associate	Orrick, Herrington & Sutcliffe
Holter, Heidi	Compensation Sr Director	Compensation
Huynh, Tom	Environ Hlth/Sfty Manager	Environ. Health & Safety US
<b>Jacobs, Sophi</b>	Corporate Attorney Manager	Investigations & Child Safety
Jain, Antone	Environ Hlth/Sfty Eng	Environ. Health & Safety US
Jenkinson, Christoph	Financial Director	GBS GBL H2R
Johnson, Carl	Project/Program Manager	Environ. Health & Safety US

Kagramanov, Aleks	ER Business Partner	Employee Relations - US
<b>Kim, Kwang</b>	Corporate Attorney Director	Legal - HR
Lagares, Antonio	ER Business Partner Manager	Employee Relations - US
Loewe, Dylan	Public Relations Director	PR
Low, Stella	Public Relations Director	PR
Marker-Ok, Kym	HR Business Partner VP	Retail - People
<b>Matarrese, Kyle</b>	Corporate Attorney	Legal - HR
O'Brien, Deirdre	SVP	People and Retail
McLeod, Eddie	HR Director	Talent Mobility - US
Okpo, Ekelemchi	ER Business Partner	Employee Relations - US
<b>Perez, Isela</b>	Corporate Attorney Manager	Legal - HR
<b>Perry, Jessica R.</b>	Counsel	Orrick, Herrington & Sutcliffe
<b>Polinsky, Melissa Marrus</b>	Corporate Attorney Director	Investigations & Child Safety
Polkes, Helen	HR Business Partner Manager	BHR Hardware (R&D)
Huguet Quayle, Kristin / Huguet, Kristin	Public Relations VP	PR
Raspe, Kristina	Facilities VP	Real Estate & Development
Reicher, Joni	Employee Relations Sr Director	People Support Ops and Privacy
<b>Rice, Debbie</b>	Sr. Director	Legal - HR
Richardson, Meagan (or Meg)	ER Business Partner	Employee Relations - US
Rosenstock, Josh	Public Relations Sr Director	PR
<b>Rubenstein, Debra</b>	Legal Counsel	Legal - Real Estate
Rubin, Isaac	Writer	PR
<b>Said, Deena</b>	Corporate Attorney Manager	Compliance & Business Conduct
Sainz, Fred	Public Relations Sr Director	PR
Schiesl, Dallas	Benefits Analyst	Benefits - US



Schmidt, Elizabeth	Environ Hlth/Sfty Director	Environ. Health & Safety US
Shifman, Moshe (Mo)	ER Business Partner Manager	Employee Relations - US
Sidlow, Scott	Environ Hlth/Sfty Manager	Environ. Health & Safety US
Souza, Emily	ER Business Partner Manager	Employee Relations - US
Steiger, Michael	Environ Hlth/Sfty Manager	Environ. Health & Safety US
Ternus, John	SVP	Hardware
Thomas, Robert	Environ Hlth/Sfty Manager	Environ. Health & Safety US
Tulley, Rachel Wolf	Sr PR Manager	PR
Waibel, Jenna	ER Business Partner Manager	Employee Relations - US
Waldo, Jen	HR Business Partner VP	People
Warner, Adelmise	Employee Relations Sr Director	People
Whye, Barbara	HR VP	People



P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
001	2021-03-17 to 2021-03-18	Wed – Thu	2	Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Deena Said (Legal - Compliance) Timos Gies (Legal - Compliance)	Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.) Antone Jaine (EH&S Mngr.) Deena Said (Legal - Compliance) Timos Gies (Legal - Compliance)	Email	7	<b>Re: Action Needed- SD01 EHS Request</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to	
002	2021-03-19	Friday	1	Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.) Antone Jaine (EH&S Mngr.)		Document	4	<b>DRAFT Talking Points SD01 comms 2 with djr &amp; mts comments.docx</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
003	2021-03-19	Friday	1	Debra Rubenstein (EH&S Legal) Antone Jaine (EH&S Mngr.)		Document	4	<b>DRAFT Talking Points SD01 comms 2 with djr comments.docx</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
004	2021-03-19	Friday	1	Michael Steiger (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Ed Baylosis (EH&S Mngr.) Elizabeth Schmidt (EH&S Director) Michael Steiger (EH&S Mngr.) Scott Sidlow (EH&S Mngr.) Sue Creighton (EH&S Mngr.)	Calendar File	2	<b>SD01 - Vapor Intrusion comms plan</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
005	2021-03-19	Friday	1	Michael Steiger (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Ed Baylosis (EH&S Mngr.) Elizabeth Schmidt (EH&S Director) Michael Steiger (EH&S Mngr.) Scott Sidlow (EH&S Mngr.) Sue Creighton (EH&S Mngr.)	Calendar File	2	<b>SD01 - Vapor Intrusion comms plan</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
006	2021-03-17 to 2021-03-19	Wed – Fri	3	Michael Steiger (EH&S Mngr.) Antone Jaine (EH&S Mngr.) Austin Debaine (EH&S Mngr.)	Antone Jaine (EH&S Mngr.) Austin Debaine (EH&S Mngr.) Tom Huynh (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.)	Email	6	<b>Re: Action Needed- SD01 EHS Request</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to	
007	2021-03-17 to 2021-03-19	Wed – Fri	3	Michael Steiger (EH&S Mngr.) Ed Baylosis (EH&S Mngr.) Sue Creighton (EH&S Mngr.) Antone Jaine (EH&S Mngr.)	Ed Baylosis (EH&S Mngr.) Elizabeth Schmidt (EH&S Director) Sue Creighton (EH&S Mngr.) Scott Sidlow (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.) Austin Debaine (EH&S Mngr.) Tom Huynh (EH&S Mngr.) Antone Jaine (EH&S Mngr.)	Email with attachment s	16	<b>Re: Privileged and confidential: Re: [Important] Action Needed- SD01 EHS Request</b>  <b>DRAFT Talking Points SD01 comms 2 with djr comments.docx</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
008	2021-03-18 to 2021-03-19	Thu – Fri	2	Michael Steiger (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Antone Jaine (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Antone Jaine (EH&S Mngr.) Michael Steiger (EH&S Mngr.)	Email with attachment s	15	<b>Re: Review - Draft talking points</b>  <b>DRAFT Talking Points SD01 comms 2 with djr &amp; mts comments.docx</b>  <b>DRAFT Talking Points SD01 comms 2 with djr comments.docx</b>  <b>DRAFT Talking Points SD01 comms 2.docx</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
009	2021-03-26	Friday	1	Debra Rubenstein (EH&S Legal)	Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.)	Calendar File	1	<b>Preparation for meeting in follow up to questions re SD01</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
010	2021-03-18 to 2021-03-26	Thu – Fri	9	Debra Rubenstein (EH&S Legal) Antone Jaine (EH&S Mngr.) Emily Souza (HR Business Partner Mngr) Helen Polkes (HR Business Partner) Michael Steiger (EH&S Mngr.) Jenna Waibel (HR ER, Investigator)	Helen Polkes (HR Business Partner) Antone Jaine (EH&S Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.) Kyle Matarrese (Legal, HR) Isela Perez (Legal, HR Mngr.) Emily Souza (HR Business Partner Mngr) Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.) Austin Debaine (EH&S Mngr.) Tom Huynh (EH&S Mngr.)	Email	26	<b>Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
011	2021-03-29	Monday	1	Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.)	Michael Steiger (EH&S Mngr.) Debra Rubenstein (EH&S Legal)	Email	2	<b>Re: SD01 EHS Request</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to	
012	2021-03-18 to 2021-03-29	Thu – Mon	12	Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner) Emily Souza (HR Business Partner Mngr)	Michael Steiger (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Kyle Matarrese (Legal, HR) Isela Perez (Legal, HR Mngr.) Antone Jain (EH&S Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.) Antone Jaine (EH&S Mngr.)	Email	15	<b>Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
013	2021-03-31	Wednesday	1	Michael Steiger (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Emily Souza (HR Business Partner Mngr) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Kyle Matarrese (Legal, HR) Michael Steiger (EH&S Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.)'	Calendar File	1	<b>SD01</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
014	2021-04-02	Friday	1	Michael Steiger (EH&S Mngr.) Antone Jaine (EH&S Mngr.)		Document	5	<b>SD01 Talking Points - mts edits.docx</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
015	2021-03-17 to 2021-04-02	Wed – Fri	17	Debra Rubenstein (EH&S Legal) Kyle Matarrese (Legal, HR) Isela Perez (Legal, HR Mngr.) Emily Souza (HR Business Partner Mngr) Michael Steiger (EH&S Mngr.)	Kyle Matarrese (Legal, HR) Isela Perez (Legal, HR Mngr.) Emily Souza (HR Business Partner Mngr) Moshe Shifman (HR Empl. Rel. Mngr.) Michael Steiger (EH&S Mngr.) Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal)	Email with attachment s	20	<b>Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT</b>  <b>SD01 Talking Points.docx</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
016	2021-03-18 to 2021-04-03	Thu – Sat	17	Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.) Helen Polkes (HR Business Partner) Debra Rubenstein (EH&S Legal) Emily Souza (HR Business Partner Mngr)	Michael Steiger (EH&S Mngr.) Helen Polkes (HR Business Partner) Antone Jaine (EH&S Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.) Kyle Matarrese (Legal, HR) Isela Perez (Legal, HR Mngr.) Emily Souza (HR Business Partner Mngr) Debra Rubenstein (EH&S Legal) Jenna Waibel (HR ER, Investigator)	Email	16	<b>Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
017	2021-03-18 to 2021-04-05	Thu – Mon	19	Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Emily Souza (HR Business Partner Mngr)	Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.) Helen Polkes (HR Business Partner) Antone Jaine (EH&S Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.) Kyle Matarrese (Legal, HR) Isela Perez (Legal, HR Mngr.) Emily Souza (HR Business Partner Mngr) Debra Rubenstein (EH&S Legal) Elizabeth Schmidt (EH&S Director)	Email	18	<b>Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
018	2021-04-08 to 2021-04-09	Thu – Fri	2	Isela Perez (Legal, HR Mngr.) Helen Polkes (HR Business Partner)	Helen Polkes (HR Business Partner) Jenna Waibel (HR ER, Investigator) Isela Perez (Legal, HR Mngr.)	Email	2	<b>Re: Privileged and confidential</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to	
019	2021-04-09	Friday	1	Michael Steiger (EH&S Mngr.)	Jenna Waibel (HR ER, Investigator) Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Kyle Matarrese (Legal, HR) Moshe Shifman (HR Empl. Rel. Mngr.) Emily Souza (HR Business Partner Mngr)	Email	8	<b>Fwd: SD01 EHS Request - 4/2 Notes</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
020	2021-04-09	Friday	1	Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.)	Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner)	Email	2	<b>Re: Privileged and confidential</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to	
021	2021-04-10	Saturday	1	Michael Steiger (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Antone Jaine (EH&S Mngr.)	Email	8	<b>Fwd: SD01 EHS Request - 4/2 Notes</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
022	2021-04-09 to 2021-04-10	Fri – Sat	2	Helen Polkes (HR Business Partner)	Jenna Waibel (HR ER, Investigator)	Email	5	<b>Re: Escalated to Dan West—Fwd: SD01 EHS Request - ER Note</b>	Attorney Client Privilege	Attorney-client privileged communications between employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	APL-GAELG_0001248
023	2021-03-18 to 2021-04-11	Thu – Sun	25	Michael Steiger (EH&S Mngr.) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Debra Rubenstein (EH&S Legal) Emily Souza (HR Business Partner Mngr)	Helen Polkes (HR Business Partner) Antone Jaine (EH&S Mngr.) Emily Souza (HR Business Partner Mngr) Isela Perez (Legal, HR Mngr.) Kyle Matarrese (Legal, HR) Moshe Shifman (HR Empl. Rel. Mngr.) Jenna Waibel (HR ER, Investigator) Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.)	Email with attachments	281	<b>Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT</b>  <b>SD01 Talking Points.docx</b>  <b>2016-0211-Microwave-VI Evaluation</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
024	2021-04-11	Sunday	1	Michael Steiger (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Antone Jaine (EH&S Mngr.)	Email	26	<b>Fwd: SD01 EHS Request - 4/2 Notes</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to	
025	2021-04-12	Monday	1	Jenna Waibel (HR ER, Investigator)	Helen Polkes (HR Business Partner)	Messages	4	<b>Message_JennaWaibel_2021-04-12_18-11-48.pdf</b>	Attorney Client Privilege	Message with redacted text reflecting communication of legal advice from counsel (Isela Perez (Legal, HR Mngr.)) from employees acting under the direction and supervision of counsel related to the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues.	APL-GAELG_0001254
026	2021-03-18 to 2021-04-13	Thu – Tue	27	Debra Rubenstein (EH&S Legal) Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.) Helen Polkes (HR Business Partner) Emily Souza (HR Business Partner Mngr)	Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Michael Steiger (EH&S Mngr.) Antone Jaine (EH&S Mngr.) Emily Souza (HR Business Partner Mngr) Isela Perez (Legal, HR Mngr.) Kyle Matarrese (Legal, HR) Moshe Shifman (HR Empl. Rel. Mngr.) Debra Rubenstein (EH&S Legal)	Email	20	<b>Re: Action Needed- SD01 EHS Request - PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
027	2021-04-11 to 2021-04-13	Sun – Tue	3	Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.) Antone Jaine (EH&S Mngr.)	Email with attachments	42	<b>Re: SD01 EHS Request - 4/2 Notes -- PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT</b>  <b>draft SD01 talking points 2nd meeting.pages</b>  <b>Draft Response to Ashley - 4-11- 21 PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT with djr comments.docx</b>  <b>Draft Response to Ashley - 4- 11-21 PRIVILEGED AND</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
028	2021-04-26	Monday	1	Michael Steiger (EH&S Mngr.)	Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Elizabeth Schmidt (EH&S Director) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.)	Calendar File	1	<b>EPA - Ashley - SD01</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
029	2021-04-26	Monday	1	Michael Steiger (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator)	Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Moshe Shifman (HR Empl. Rel. Mngr.) Emily Souza (HR Business Partner Mngr.) Helen Polkes (HR Business Partner) Kyle Matarrese (Legal, HR) Antone Jaime (EH&S Mngr.) Elizabeth Schmidt (EH&S Director) Michael Steiger (EH&S Mngr.)	Email	7	<b>Re: Employee Concerns: TRW Microwave Site</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
030	2021-04-24 to 2021-04-27	Sat – Tue	4	Helen Polkes (HR Business Partner) Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.)	Michael Steiger (EH&S Mngr.) Isela Perez (Legal, HR Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.) Jenna Waibel (HR ER, Investigator) Antone Jaime (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner)	Email with attachments	2	<b>Privileged and confidential 3-%2B14087837834-1619213246000-1</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
031	2021-04-27	Tuesday	1	Michael Steiger (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Antone Jaime (EH&S Mngr.) Jenna Waibel (HR ER, Investigator) Moshe Shifman (HR Empl. Rel. Mngr.) Kyle Matarrese (Legal, HR) Elizabeth Schmidt (EH&S Director)	Email	3	<b>Fwd: Questions about speech related to Apple's buildings on chemical release sites</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
032	2021-04-27	Tuesday	1	Helen Polkes (HR Business Partner)	Yannick Bertolus (PI VP) Megan Bowman (HR Director) Jenna Waibel (HR ER, Investigator) Isela Perez (Legal, HR Mngr.)	Email	1	<b>Privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
033	2021-04-26 to 2021-04-27	Mon – Tue	2	Yannick Bertolus (PI VP) Helen Polkes (HR Business Partner) Megan Bowman (HR Director) Jenna Waibel (HR ER, Investigator)	Isela Perez (Legal, HR Mngr.) Megan Bowman (HR Director) John Ternus (Hardware Eng. Sr. VP) Helen Polkes (HR Business Partner) Jenna Waibel (HR ER, Investigator)	Email	3	<b>Fwd: Privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
034	2021-04-27	Tuesday	1	Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.)	Moshe Shifman (HR Empl. Rel. Mngr.) Isela Perez (Legal, HR Mngr.) Debra Rubenstein (EH&S Legal) Antone Jaime (EH&S Mngr.) Jenna Waibel (HR ER, Investigator) Kyle Matarrese (Legal, HR) Elizabeth Schmidt (EH&S Director)	Email	5	<b>Privileged &amp; Confidential---Fwd: Questions about speech related to Apple's buildings on chemical release sites</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
035	2021-04-24 to 2021-04-27	Sat – Tue	4	Michael Steiger (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner)	Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.) Jenna Waibel (HR ER, Investigator) Antone Jaime (EH&S Mngr.) Debra Rubenstein (EH&S Legal)	Email	2	<b>Re: Privileged and confidential</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
036	2021-04-26 to 2021-04-28	Mon – Wed	3	Helen Polkes (HR Business Partner) Antonio Lagares (HR Empl. Rel. Sr. Mngr.) Jenna Waibel (HR ER, Investigator) Megan Bowman (HR Director) Yannick Bertolus (PI VP)	Yannick Bertolus (PI VP) Megan Bowman (HR Director) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner)	Email	3	<b>Re: Privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
037	2021-04-30	Friday	1	Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner)	Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator)	Email	4	<b>Re: Privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
038	2021-05-01 to 2021-05-03	Sat – Mon	3	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director)	Email	3	<b>Re: HR legal weekly update 4.30.21</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	



P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
039	2021-04-27 to 2021-05-06	Tue – Thu	10	Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.) Antone Jaine (EH&S Mngr.)	Email with attachment s	29	<b>Re: SD01 EHS Request - 4/2 Notes</b>  <b>Draft Response to Ashley - 4- 30-21 PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT with djr comments .docx</b>  <b>Draft Response to Ashley - 4- 30-21 PRIVILEGED AND CONFIDENTIAL - ATTORNEY</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
040	2021-05-11	Tuesday	1	Michael Steiger (EH&S Mngr.)		Document	9	<b>Talking Points for Ashley - 5-11-21 PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT-3.docx</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
041	2021-05-10 to 2021-05-12	Mon – Wed	3	Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.)	Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator)	Email	7	<b>Re: Privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
042	2021-04-30 to 2021-05-12	Fri – Wed	13	Antone Jaine (EH&S Mngr.) Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.)	Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.); Debra Rubenstein (EH&S Legal) Antone Jaine (EH&S Mngr.)	Email	4	<b>Re: Names for additional conversations - Privileged and Confidential - Attorney work product</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
043	2021-05-11 to 2021-05-12	Tue – Wed	2	Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner)	Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.)	Email	3	<b>Re: Privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
044	2021-05-11 to 2021-05-12	Tue – Wed	2	Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner)	Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.)	Email	2	<b>Re: Privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
045	2021-04-30 to 2021-05-13	Fri – Thu	14	Antone Jaine (EH&S Mngr.) Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.)	Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.); Debra Rubenstein (EH&S Legal) Antone Jaine (EH&S Mngr.)	Email	5	<b>Re: Names for additional conversations - Privileged and Confidential - Attorney work product</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
046	2021-05-11 to 2021-05-13	Tue – Thu	3	Kyle Matarrese (Legal, HR) Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.) Jenna Waibel (HR ER, Investigator) Antone Jaine (EH&S Mngr.) Elizabeth Schmidt (EH&S Director) Isela Perez (Legal, HR Mngr.) Helen Polkes (HR Business Partner) Moshe Shifman (HR Empl. Rel. Mngr.) Kyle Matarrese (Legal, HR)	Email with attachment s	4	<b>Re: EHS Talking Points for Follow-Up with Ashle</b>  <b>PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT</b> <b>IAL++ATTORNEY+ WORK+ PRODUCT+ with+djr+ comments.docx</b>  <b>Talking+ Points+ for+ Ashley++5-11-21+ PRIVILEGED+ AND+</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
047	2021-04-27 to 2021-05-17	Tue – Mon	21	Debra Rubenstein (EH&S Legal) Kyle Matarrese (Legal, HR) Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.)	Kyle Matarrese (Legal, HR) Jenna Waibel (HR ER, Investigator) Michael Steiger (EH&S Mngr.) Isela Perez (Legal, HR Mngr.) Antone Jaine (EH&S Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.) Elizabeth Schmidt (EH&S Director) Debra Rubenstein (EH&S Legal)	Email	15	<b>Re: Questions about speech related to Apple's buildings on chemical release sites</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
048	2021-05-17	Monday	1	Helen Polkes (HR Business Partner)	Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator)	Email	5	<b>Privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
049	2021-05-17 to 2021-05-18	Mon – Tue	2	Jenna Waibel (HR ER, Investigator) Dallas Schiesl (HR Benefits)	Dallas Schiesl (HR Benefits) Isela Perez (Legal, HR Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.) Jenna Waibel (HR ER, Investigator)	Email	2	<b>Re: Privileged &amp; Confidential-- Additional WC case</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal	
050	2021-05-17 to 2021-05-18	Mon – Tue	2	Dallas Schiesl (HR Benefits) Jenna Waibel (HR ER, Investigator)	Jenna Waibel (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.) Dallas Schiesl (HR Benefits)	Email	2	<b>Re: Privileged &amp; Confidential-- Additional WC case</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
051	2021-05-21	Friday	1	Helen Polkes (HR Business Partner) Jenna Waibel (HR ER, Investigator)	Jenna Waibel (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Helen Polkes (HR Business Partner)	Email	4	<b>Re: Privileged &amp; confidential—Fwd: Ashley Gjovik/Dan - 4/29 Meeting Notes</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
052	2021-05-22	Saturday	1	Jenna Waibel (HR ER, Investigator)	Isela Perez (Legal, HR Mngr.) Helen Polkes (HR Business Partner)	Email with attachment s	7	<b>Privileged &amp; Confidential—Fwd: Request for Denial Authorization on Environmental/Chemical Exposure Claim - Ashley Gjovik, Claim 30217483107-0001 image001.jpg</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy, and in anticipation of litigation.	
053	2021-04-27 to 2021-05-26	Tue – Wed	30	Jenna Waibel (HR ER, Investigator) Scott Sidlow (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.) Antone Jaine (EH&S Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.) Elizabeth Schmidt (EH&S Director) Scott Sidlow (EH&S Mngr.) Jenna Waibel (HR ER, Investigator)	Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Michael Steiger (EH&S Mngr.) Kyle Matarrese (Legal, HR) Antone Jaine (EH&S Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.) Elizabeth Schmidt (EH&S Director) Scott Sidlow (EH&S Mngr.) Jenna Waibel (HR ER, Investigator)	Email	12	<b>Re: Privileged &amp; Confidential--- Re: Questions about speech related to Apple's buildings on chemical release sites</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
054	2021-06-03 to 2021-06-04	Thu – Fri	2	Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator)	Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner)	Email	4	<b>Re: Privileged &amp; Confidential— Fwd: Wrap up call today</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
055	2021-06-03 to 2021-06-04	Thu – Fri	2	Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator)	Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.)	Email	3	<b>Re: Privileged &amp; Confidential— Fwd: Wrap up call today</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
056	2021-05-20 to 2021-06-08	Thu – Tue	20	Scott Sidlow (EH&S Mngr.) Jenna Waibel (HR ER, Investigator) Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.) Antone Jaine (EH&S Mngr.) Isela Perez (Legal, HR Mngr.)	Jenna Waibel (HR ER, Investigator) Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Michael Steiger (EH&S Mngr.) Kyle Matarrese (Legal, HR) Moshe Shifman (HR Empl. Rel. Mngr.) Elizabeth Schmidt (EH&S Director) Scott Sidlow (EH&S Mngr.)	Email	2	<b>Re: SD01 additional EHS communications - privileged and confidential - attorney work product</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
057	2021-06-10	Thursday	1	Debra Rubenstein (EH&S Legal) Jenna Waibel (HR ER, Investigator)	Jenna Waibel (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Helen Polkes (HR Business Partner) Moshe Shifman (HR Empl. Rel. Mngr.) Michael Steiger (EH&S Mngr.) Antone Jaine (EH&S Mngr.) Scott Sidlow (EH&S Mngr.) Kyle Matarrese (Legal, HR) Elizabeth Schmidt (EH&S Director) Debra Rubenstein (EH&S Legal)	Email	2	<b>Re: Privileged &amp; Confidential-additional meeting needed on VI</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	



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058	2021-06-11	Friday	1	Jenna Waibel (HR ER, Investigator)		Document	5	AMR_ Investigation_Summary_D. Powers_Jun2021.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
059	2021-06-11	Friday	1	Jenna Waibel (HR ER, Investigator)		Document	11	A. Gjovik Interview Notes.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
060	2021-06-12	Saturday	1	Jenna Waibel (HR ER, Investigator)		Document	6	D. Powers Interview Notes .pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
061	2021-06-12	Saturday	1	Jenna Waibel (HR ER, Investigator)		Document	2	N. Balamurugan Interview Notes.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
062	2021-06-12	Saturday	1	Jenna Waibel (HR ER, Investigator)		Document	2	J. Markham Interview Notes.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
063	2021-06-12	Saturday	1	Jenna Waibel (HR ER, Investigator)		Document	1	I&D Interview Notes.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
064	2021-06-12	Saturday	1	Jenna Waibel (HR ER, Investigator)		Document	2	M. Ertell Interview Notes .pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
065	2021-06-12	Saturday	1	Jenna Waibel (HR ER, Investigator)		Document	2	M. Mathur Interview Notes.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
066	2021-06-12	Saturday	1	Jenna Waibel (HR ER, Investigator)		Document	4	D. West Interview Notes.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
067	2021-06-12	Saturday	1	Jenna Waibel (HR ER, Investigator)		Document	2	J. Ivan Interview Notes.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
068	2021-06-04 to 2021-06-16	Fri – Wed	13	Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator)	Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.)	Email	8	Re: Privileged & Confidential--DRAFTED notes for call with AG	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
069	2021-05-20 to 2021-06-21	Thu – Mon	33	Jenna Waibel (HR ER, Investigator) Antone Jaine (EH&S Mngr.) Scott Sidlow (EH&S Mngr.)	Antone Jaine (EH&S Mngr.) Scott Sidlow (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Michael Steiger (EH&S Mngr.) Kyle Matarrese (Legal, HR) Moshe Shifman (HR Empl. Rel. Mngr.) Elizabeth Schmidt (EH&S Director) Jenna Waibel (HR ER, Investigator)	Email	3	Re: SD01 additional EHS communications - privileged and confidential - attorney work product	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
070	2021-06-23	Wednesd ay	1	Jenna Waibel (HR ER, Investigator)		Document	5	AMR_ Investigation_Summary_D. Powers_Jun2021.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
071	2021-06-10 to 2021-06-23	Thu – Wed	14	Antone Jaine (EH&S Mngr.) Helen Polkes (HR Business Partner) Debra Rubenstein (EH&S Legal) Jenna Waibel (HR ER, Investigator)	Helen Polkes (HR Business Partner) Debra Rubenstein (EH&S Legal) Elizabeth Schmidt (EH&S Director) Kyle Matarrese (Legal, HR) Scott Sidlow (EH&S Mngr.) Michael Steiger (EH&S Mngr.) Jenna Waibel (HR ER, Investigator) Moshe Shifman (HR Empl. Rel. Mngr.) Isela Perez (Legal, HR Mngr.) Antone Jaine (EH&S Mngr.)	Email with attachment s	5	Re: Privileged & Confidential-additional meeting needed on VI  PastedGraphic-1.png  Re_+Follow+up+to+your+People+Support+reach+out+.eml	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	

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072	2021-06-22 to 2021-06-23	Tue – Wed	2	Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator)	Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Moshe Shifman (HR Empl. Rel. Mngr.) Debra Rubenstein (EH&S Legal)	Email	3	<b>Re: Discussion re contaminated sites on SLACK</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in	
073	2021-06-29	Tuesday	1	Jenna Waibel (HR ER, Investigator)	Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.)	Email	5	<b>Privileged &amp; Confidential—Fwd: Follow up call today (need info before doctor appt tomorrow)</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
074	2021-07-06	Tuesday	1	Antone Jaine (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Helen Polkes (HR Business Partner) Michael Steiger (EH&S Mngr.) Jenna Waibel (HR ER, Investigator)	Email	2	<b>Fwd: Follow up call next week</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
075	2021-07-02 to 2021-07-09	Fri – Fri	8	Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner)	Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Michael Steiger (EH&S Mngr.) Jenna Waibel (HR ER, Investigator)	Email	3	<b>Re: Privileged and Confidential -- Attorney work product Fwd: Discuss any questions about indoor air management at SD01, floor penetration survey and vapor intrusion mitigation</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in	
076	2021-07-15	Thursday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	3	<b>Ashley Gjovik (Prep meetings pre initial contact).pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations, and the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues, performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in	
077	2021-07-18	Sunday	1	Helen Polkes (HR Business Partner)	Isela Perez (Legal, HR Mngr.) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Jenna Waibel (HR ER, Investigator) Megan Bowman (HR Director)	Email	4	<b>Privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
078	2021-07-19	Monday	1	Antonio Lagares (HR Empl. Rel. Sr. Mngr)	Antonio Lagares (HR Empl. Rel. Sr. Mngr) Ekelemchi Okpo (HR ER, Investigator) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator)	Calendar File	1	<b>Privileged and Confidential - Gjovik</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
079	2021-07-19	Monday	1	Jenna Waibel (HR ER, Investigator)	Antone Jaine (EH&S Mngr.) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator)	Calendar File	1	<b>EHS/ AG Sync</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in	
080	2021-07-19	Monday	1	Isela Perez (Legal, HR Mngr.) Helen Polkes (HR Business Partner)	Helen Polkes (HR Business Partner) Ekelemchi Okpo (HR ER, Investigator) Jenna Waibel (HR ER, Investigator) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Isela Perez (Legal, HR Mngr.)	Email	9	<b>Re: privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
081	2021-07-19	Monday	1	Helen Polkes (HR Business Partner)	Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Ekelemchi Okpo (HR ER, Investigator) Antonio Lagares (HR Empl. Rel. Sr. Mngr)	Email with attachment s	5	<b>Privileged and confidential PastedGraphic-3.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
082	2021-07-16 to 2021-07-21	Fri – Wed	6	Emily Souza (HR Business Partner Mngr) Megan Bowman (HR Director) Moshe Shifman (HR Empl. Rel. Mngr.) Helen Polkes (HR Business Partner)	Megan Bowman (HR Director) Moshe Shifman (HR Empl. Rel. Mngr.) Helen Polkes (HR Business Partner) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Emily Souza (HR Business Partner Mngr)	Email	3	<b>Re: Privileged and confidential</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy.	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
083	2021-07-16 to 2021-07-21	Fri - Wed	6	Megan Bowman (HR Director) Isela Perez (Legal, HR Mngr.) Emily Souza (HR Business Partner Mngr) Moshe Shifman (HR Empl. Rel. Mngr.) Helen Polkes (HR Business Partner) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Ekelemchi Okpo (HR ER, Investigator) Jenna Waibel (HR ER, Investigator) Megan Bowman (HR Director)	Isela Perez (Legal, HR Mngr.) Emily Souza (HR Business Partner Mngr) Moshe Shifman (HR Empl. Rel. Mngr.) Helen Polkes (HR Business Partner) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Ekelemchi Okpo (HR ER, Investigator) Jenna Waibel (HR ER, Investigator) Megan Bowman (HR Director)	Email	3	<b>Re: Privileged and confidential</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy.	
084	2021-07-23	Friday	1	Jenna Waibel (HR ER, Investigator)		Document	4	<b>Privileged &amp; Confidential- A. Gjovik Concerns Matrix.numbers</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
085	2021-07-22 to 2021-07-23	Thu - Fri	2	Ekelemchi Okpo (HR ER, Investigator) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.)	Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Ekelemchi Okpo (HR ER, Investigator)	Email	2	<b>Re: Privileged and Confidential - A.G. Sync</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
086	2021-07-26	Monday	1	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Kwang Kim (Legal Director, HR) Adelmise Warner (HR ER Sr. Director)	Email	4	<b>Re: Privileged and Confidential - A.G. Women in SWE</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
087	2021-07-20 to 2021-07-27	Tue - Tue	8	Debra Rubenstein (EH&S Legal) Antone Jaine (EH&S Mngr.) Jenna Waibel (HR ER, Investigator)	Antone Jaine (EH&S Mngr.) Jenna Waibel (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Helen Polkes (HR Business Partner) Debra Rubenstein (EH&S Legal)	Email	4	<b>Re: Privileged &amp; Confidential-Meeting notes from 7/7/21</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
088	2021-07-28	Wednesd ay	1	Ekelemchi Okpo (HR ER, Investigator)		Document	3	<b>Employment History AG (Working Draft).pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
089	2021-07-27 to 2021-07-28	Tue - Wed	2	Joni Reicher (HR ER Sr. Director) Emily Souza (HR Business Partner Mngr)	Emily Souza (HR Business Partner Mngr) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Moshe Shifman (HR Empl. Rel. Mngr.)	Email	4	<b>Re: Attorney client privilege: Gjovik's request for accommodation</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy.	
090	2021-07-28	Wednesd ay	1			Document	1	<b>2020 Powers Feedback.pdf</b>	Attorney Client Privilege	Documents reflecting privileged and confidential internal projects, assignments and tasks associated with Apple's legal operations.	APL-GAELG_00001040
091	2021-07-28	Wednesd ay	1			Document	1	<b>2020 Powers Feedback.pages</b>	Attorney Client Privilege	Documents reflecting privileged and confidential internal projects, assignments and tasks associated with Apple's legal operations.	APL-GAELG_00001033
092	2021-07-28	Wednesd ay	1			Document	1	<b>2020 Powers Feedback.pdf</b>	Attorney Client Privilege	Documents reflecting privileged and confidential internal projects, assignments and tasks associated with Apple's legal operations.	APL-GAELG_00001026
093	2021-07-29	Thursday	1	Antone Jaine (EH&S Mngr.)	Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Elizabeth Schmidt (EH&S Director) Robert Thomas (EH&S Mngr.)	Calendar File	1	<b>SD01 &amp; Ashley</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to	
094	2021-07-29	Thursday	1	Joni Reicher (HR ER Sr. Director)	Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator) Emily Souza (HR Business Partner Mngr) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Calendar File	1	<b>Attorney Client privilege AG Accommodation</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy.	
095	2021-07-27 to 2021-07-29	Tue - Thu	3	Debra Rubenstein (EH&S Legal) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Jenna Waibel (HR ER, Investigator) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal)	Email	3	<b>Re: [ Privileged and Confidential] Questions about TRW Microwave</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
096	2021-07-29	Thursday	1	Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator) Jenna Waibel (HR ER, Investigator)	Jenna Waibel (HR ER, Investigator) Ekelemchi Okpo (HR ER, Investigator) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.)	Email	3	<b>Re: Privileged and Confidential - A.G. Keynote</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
097	2021-07-29	Thursday	1	Jenna Waibel (HR ER, Investigator) Debra Rubenstein (EH&S Legal) Antone Jaine (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Antone Jaine (EH&S Mngr.) Robert Thomas (EH&S Mngr.) Jenna Waibel (HR ER, Investigator)	Email	3	<b>Re: SD01 Ashley Timeline - [Privileged &amp; Confidential]</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
098	7/29/2021	Thursday	1	Debra Rubenstein (EH&S Legal) Michael Steiger (EH&S Mngr.)	Robert Thomas (EH&S Mngr.) Antone Jaine (EH&S Mngr.) Michael Steiger (EH&S Mngr.) Elizabeth Schmidt (EH&S Director) Scott Sidlow (EH&S Mngr.) Ed Baylosis (EH&S Mngr.) Debra Rubenstein (EH&S Legal)	Email	5	<b>Fwd: [Important] Action Needed-SD01 EHS Request</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
099	2021-07-29	Thursday	1	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director)	Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Email with attachment s	3	<b>Re: ACP - AG post today</b>  <b>Screen Shot 2021-07-29 at 10.38.43 AM.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
100	2021-07-29	Thursday	1	Joni Reicher (HR ER Sr. Director)	Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email with attachment s	2	<b>ACP - AG post today</b>  <b>Screen Shot 2021-07-29 at 10.38.43 AM.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
101	2021-07-29	Thursday	1	Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director)	Email	2	<b>Re: ACP - AG post today</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
102	2021-07-30	Friday	1	Antone Jaine (EH&S Mngr.)	Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Elizabeth Schmidt (EH&S Director) Robert Thomas (EH&S Mngr.)	Calendar File	1	<b>SD01 &amp; Ashley</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to	
103	2021-07-30	Friday	1	Joni Reicher (HR ER Sr. Director)	Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Jen Waldo (HR VP) Joni Reicher (HR ER Sr. Director) Josh Rosenstock (Public Relations Sr. Dir.) Kristin Huguet Quavle (Pub. Rel. VP)	Calendar File	1	<b>Attorney Client privileged Next steps AG</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
104	2021-07-30	Friday	1	Joni Reicher (HR ER Sr. Director)	Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Calendar File	1	<b>ACP follow up AG</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
105	2021-07-30	Friday	1	Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.)	Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner)	Email	9	<b>Re: Privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
106	2021-07-30	Friday	1	Isela Perez (Legal, HR Mngr.) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Ekelemchi Okpo (HR ER, Investigator)	Antonio Lagares (HR Empl. Rel. Sr. Mngr) Ekelemchi Okpo (HR ER, Investigator); Isela Perez (Legal, HR Mngr.)	Email	9	<b>Re: Notes from our Friday call</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	



P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
107	2021-07-30	Friday	1	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director)	Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email with attachment s	4	<b>Re: ACP AG timeline and next steps</b>  <b>ACP Timeline AG as of 7.30.21.pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
108	2021-07-29 to 2021-07-31	Thu – Sat	3	Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director)	Email with attachment s	4	<b>Re: ACP - AG post today</b>  <b>Screen Shot 2021-07-29 at 10.38.43 AM.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
109	2021-07-31	Saturday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	6	<b>ACP Timeline AG as of 7.30.21.pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
110	2021-07-30 to 2021-07-31	Fri – Sat	2	Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.)	Email	2	<b>Re: ACP AG timeline and next steps</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
111	2021-07-30 to 2021-07-31	Fri – Sat	2	Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Email	2	<b>Re: ACP AG timeline and next steps</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
112	2021-07-30 to 2021-08-01	Fri – Sun	3	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Email with attachment s	5	<b>Re: ACP: AG Slack activity 7/30</b>  <b>Screen Shot 2021-07-30 at 7.43.39 PM.png</b>  <b>Screen Shot 2021-07-30 at 7.43.14 PM.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
113	2021-08-01	Sunday	1	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Kate Adams (General Counsel) Deirdre O'Brien (Sr. VP, HR) Isela Perez (Legal, HR Mngr.) Jen Waldo (HR VP) Kristin Huguet Quayle (Pub. Rel. VP) Josh Rosenstock (Public Relations Sr. Dir.)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Kate Adams (General Counsel) Deirdre O'Brien (Sr. VP, HR) Isela Perez (Legal, HR Mngr.) Jen Waldo (HR VP) Kristin Huguet Quayle (Pub. Rel. VP) Josh Rosenstock (Public Relations Sr. Dir.)	Email	4	<b>Re: ATTORNEY CLIENT PRIVILEGED - Urgent Employee Matter</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations, and the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues, performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
114	2021-07-30 to 2021-08-02	Fri – Mon	4	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email with attachment s	3	<b>Re: ACP Timeline</b>  <b>ACP Timeline AG as of 7.30.21.pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
115	2021-08-02	Monday	1	Ekelemchi Okpo (HR ER, Investigator)	Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Calendar File	1	<b>ACP: AG Debrief</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
116	2021-07-27 to 2021-08-02	Tue – Mon	7	Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Antone Jaine (EH&S Mngr.)	Isela Perez (Legal, HR Mngr.) Antone Jaine (EH&S Mngr.) Elizabeth Schmidt (EH&S Director) Ekelemchi Okpo (HR ER, Investigator) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Helen Polkes (HR Business Partner) Jenna Waibel (HR ER, Investigator) Debra Rubenstein (EH&S Legal)	Email	26	<b>Re: [Privileged and Confidential] Fwd: Questions about TRW Microwave</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
117	2021-07-29 to 2021-08-02	Thu – Mon	5	Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Meg Richardson (HR ER, Ops) Emily Souza (HR Business Partner Mngr) Meg Richardson (HR ER, Ops) Emily Souza (HR Business Partner Mngr)	Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Meg Richardson (HR ER, Ops) Emily Souza (HR Business Partner Mngr) Ekelemchi Okpo (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR)	Email	10	<b>Re: Draft for Accommodation Support of Ashley Gjovik</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy, and in anticipation of litigation.	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
118	2021-08-02	Monday	1	Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Email	2	<b>Re: ACP - AG EHS claims</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
119	2021-06-10 to 2021-08-02	Thu - Mon	54	Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Antonio Lagares (HR Empl. Rel. Sr. Mngr)	Jenna Waibel (HR ER, Investigator) Antonio Lagares (HR Empl. Rel. Sr. Mngr) Isela Perez (Legal, HR Mngr.)	Email with attachments	15	<b>Re: Privileged &amp; Confidential--Drafted Investigation summaries for review</b>  <b>AMR_ Investigation_ Summary_ D. Powers_Jun2021 .pages</b>  <b>AMR_ Investigation_ Brief_ R.Yopez_Jun2021.pages</b>  <b>AMR_ Investigation_ Summary_ D.Po</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
120	2021-08-03	Tuesday	1	Michael Steiger (EH&S Mngr.)		Document	9	<b>Talking Points for Ashley - 5-11-21 PRIVILEGED AND CONFIDENTIAL - ATTORNEY WORK PRODUCT-3.pdf</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
121	2021-08-03	Tuesday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	4	<b>Meeting Notes for A. Gjovik EHS calls.pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
122	2021-08-03	Tuesday	1	Ekelemchi Okpo (HR ER, Investigator)	Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Calendar File	1	<b>ACP - AG Debrief</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
123	2021-07-27 to 2021-08-03	Tue - Tue	8	Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director)	Email	2	<b>Re: Attorney client privileged</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
124	2021-08-02 to 2021-08-03	Mon - Tue	2	Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator)	Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Ekelemchi Okpo (HR ER, Investigator)	Email	2	<b>Re: Privileged and Confidential - EHS Notes</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
125	2021-08-02 to 2021-08-03	Mon - Tue	2	Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator)	Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Ekelemchi Okpo (HR ER, Investigator)	Email	3	<b>Re: Privileged and Confidential - EHS Notes</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
126	2021-08-02 to 2021-08-03	Mon - Tue	2	Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator) Jenna Waibel (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Jenna Waibel (HR ER, Investigator) Isela Perez (Legal, HR Mngr.)	Email	3	<b>Re: Privileged and Confidential - EHS Notes</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
127	2021-08-03	Tuesday	1	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Email	2	<b>Re: ACP: DRAFT Response to AG's 8/2 email</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
128	2021-08-02 to 2021-08-03	Mon - Tue	2	Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director)	Email	3	<b>Re: ACP - AG EHS claims</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
129	2021-08-02 to 2021-08-03	Mon – Tue	2	Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.)	Email	3	<b>Re: ACP - AG EHS claims</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
130	2021-08-03	Tuesday	1	Ekelemchi Okpo (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator)	Email	3	<b>Re: ACP: DRAFT Response to AG's 8/2 email</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
131	2021-08-02 to 2021-08-03	Mon – Tue	2	Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director)	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.)	Email	3	<b>Re: ACP - AG EHS claims</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
132	2021-08-03	Tuesday	1	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Email	3	<b>Re: ACP: DRAFT Response to AG's 8/2 email</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
133	2021-08-03 to 2021-08-04	Tue – Wed	2	Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.)	Isela Perez (Legal, HR Mngr.) Antone Jaine (EH&S Mngr.) Elizabeth Schmidt (EH&S Director) Jenna Waibel (HR ER, Investigator) Ekelemchi Okpo (HR ER, Investigator) Debra Rubenstein (EH&S Legal)	Email with attachment s	3	<b>Re: (Time sensitive) Privileged and Confidential</b>  <b>SD01+Raised+items+and+EHS+Response.docx</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in	
134	2021-08-04	Wednesday	1	Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director)	Email	3	<b>Re: Draft language for AG/misrepresentation privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
135	2021-08-04	Wednesday	1	Ekelemchi Okpo (HR ER, Investigator)	Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Email	2	<b>*ACP* Fwd: Apple Confidential: Next Steps</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
136	2021-08-03 to 2021-08-04	Tue – Wed	2	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.)	Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR)	Email	2	<b>Re: Privileged and Confidential - DRAFT Confirmatory email to AG</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
137	2021-08-03 to 2021-08-04	Tue – Wed	2	Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Perez. Isela	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Email	4	<b>Re: Privileged and Confidential - DRAFT Confirmatory email to AG</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
138	2021-08-03 to 2021-08-04	Tue – Wed	2	Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director)	Email	3	<b>Re: Privileged and Confidential - DRAFT Confirmatory email to AG</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
139	2021-08-05	Thursday	1	Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director); Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email	3	<b>Re: *ACP* Fwd: Apple Confidential: Next Steps</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
140	2021-08-03 to 2021-08-05	Tue – Thu	3	Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.)	Isela Perez (Legal, HR Mngr.) Elizabeth Schmidt (EH&S Director) Jenna Waibel (HR ER, Investigator) Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Kwang Kim (Legal Director, HR) Debra Rubenstein (EH&S Legal)	Email with attachment s	4	<b>Re: (Time sensitive) Privileged and Confidential image2.jpeg.jpeg</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications and documents sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
141	2021-08-05	Thursday	1	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Joni Reicher (HR ER Sr. Director) Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Adelmise Warner (HR ER Sr. Director)	Email	2	<b>JR Notes Fwd: ACP Agenda for this morning</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
142	2021-08-03 to 2021-08-05	Tue – Thu	3	Kate Adams (General Counsel) Kristin Huguet Quayle (Pub. Rel. VP) Joni Reicher (HR ER Sr. Director) Deirdre O'Brien (Sr. VP, HR) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Stella Low (Public Relations Director)	Stella Low (Public Relations Director) Jen Waldo (HR VP) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Josh Rosenstock (Public Relations Sr. Dir.) Kate Adams (General Counsel) Deirdre O'Brien (Sr. VP, HR) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Kristin Huguet Quayle (Pub. Rel. VP)	Email	7	<b>Re: ATTORNEY CLIENT PRIVILEGED - Ashley tweet - Verge story in 30 minutes</b>  <b>Screen Shot 2021-08-04 at 1.58.44 PM.png</b>  <b>Screen Shot 2021-08-04 at 1.59.22 PM.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
143	2021-07-31 to 2021-08-05	Sat – Thu	6	Joni Reicher (HR ER Sr. Director) Deirdre O'Brien (Sr. VP, HR)	Kate Adams (General Counsel) Debbie Rice (Legal Sr. Director, HR) Jen Waldo (HR VP) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Deirdre O'Brien (Sr. VP, HR)	Email with attachment s	7	<b>Re: Background for tomorrow Fwd: ATTORNEY CLIENT PRIVILEGED - Urgent Employee Matter Privileged &amp; Confidential- A. Gjovik Concerns Matrix copy.numbers</b> <b>Screen Shot 2021-07-31 at 6.05.16 AM.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations, and the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues, performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
144	2021-08-04 to 2021-08-05	Wed – Thu	2	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Deirdre O'Brien (Sr. VP, HR)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Deirdre O'Brien (Sr. VP, HR)	Email with attachment s	11	<b>Re: ATTORNEY CLIENT PRIVILEGED Re: Background for tomorrow</b>  <b>AMR_Investigation_Summary_D. Powers_Jun2021.pages</b>  <b>Privileged &amp; Confidential- A. Gjovik Concerns Matrix.numbers</b> <b>[Revised email] Re: Proposed email to AG Fwd: Privileged and Confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
145	2021-08-04 to 2021-08-05	Wed – Thu	2	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Josh Rosenstock (Public Relations Sr. Dir.)	Joni Reicher (HR ER Sr. Director) Kate Adams (General Counsel) Deirdre O'Brien (Sr. VP, HR) Jen Waldo (HR VP) Kristin Huguet Quayle (Pub. Rel. VP) Debbie Rice (Legal Sr. Director, HR) Stella Low (Public Relations Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.)	Email	10	<b>Re: For review-draft language from EO/AG privileged and confidential</b>  <b>Privileged and Confidential - Fwd: Apple places female engineering program Mngr. on administrative leave after tweeting about sexism in</b> <b>Re: ADA Medical Request for Full Remote Work - Accommodation Certificate Form Attached (PII)- Privileged and confidential</b> <b>utf-8 "Fwd%3A Ashley Gjovik %5F293492 %E2%80%933 Action Required%3A Review Accommodation Request.eml</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations, performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
146	2021-08-03 to 2021-08-06	Tue – Fri	4	Meg Richardson (HR ER, Ops) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Emily Souza (HR Business Partner Mngr) Moshe Shifman (HR Empl. Rel. Mngr.) Jenna Waibel (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Emily Souza (HR Business Partner Mngr) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Moshe Shifman (HR Empl. Rel. Mngr.) Meg Richardson (HR ER, Ops) Adelmise Warner (HR ER Sr. Director)	Email with attachment s	19	<b>Re: ADA Medical Request for Full Remote Work - Accommodation Certificate Form Attached (PII)- Privileged and confidential</b> <b>utf-8 "Fwd%3A Ashley Gjovik %5F293492 %E2%80%933 Action Required%3A Review Accommodation Request.eml</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy, and in anticipation of litigation.	
147	2021-07-20 to 2021-08-07	Tue – Sat	19	Isela Perez (Legal, HR Mngr.) Debra Rubenstein (EH&S Legal) Jenna Waibel (HR ER, Investigator) Antone Jaine (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Jenna Waibel (HR ER, Investigator) Antone Jaine (EH&S Mngr.) Helen Polkes (HR Business Partner) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.)	Email	13	<b>Re: Privileged &amp; Confidential-Meeting notes from 7/7/21</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	



P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
148	2021-08-07 to 2021-08-08	Sat – Sun	2	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.)	Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Email	2	<b>Re: Privileged and Confidential - AG Twitter Posts</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
149	2021-08-05 to 2021-08-09	Thu – Mon	5	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Email	3	<b>Re: ACP - draft issue confirmation</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
150	2021-08-10	Tuesday	1	Antone Jaine (EH&S Mngr.)	Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Robert Thomas (EH&S Mngr.)	Calendar File	2	<b>SD01 check in</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
151	2021-07-20 to 2021-08-10	Tue – Tue	22	Jenna Waibel (HR ER, Investigator) Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.)	Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Helen Polkes (HR Business Partner) Ekelemchi Okpo (HR ER, Investigator) Jenna Waibel (HR ER, Investigator)	Email	15	<b>Re: Privileged &amp; Confidential-Meeting notes from 7/7/21</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
152	2021-08-09 to 2021-08-10	Mon – Tue	2	Helen Polkes (HR Business Partner) Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.)	Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Helen Polkes (HR Business Partner)	Email	3	<b>Re: Privileged and confidential</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
153	2021-08-09 to 2021-08-10	Mon – Tue	2	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debra Rubenstein (EH&S Legal)	Isela Perez (Legal, HR Mngr.) Debra Rubenstein (EH&S Legal) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Email	3	<b>Re: AG/EPA on site visit 8/19 privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
154	2021-08-12	Thursday	1	Debbie Rice (Legal Sr. Director, HR)	Debbie Rice (Legal Sr. Director, HR) Jen Waldo (HR VP) Joni Reicher (HR ER Sr. Director)	Calendar File	1	<b>External investigator/AG</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
155	2021-08-12	Thursday	1	Joni Reicher (HR ER Sr. Director)	Debbie Rice (Legal Sr. Director, HR) Jen Waldo (HR VP) Joni Reicher (HR ER Sr. Director)	Calendar File	1	<b>External Investigstor/AG</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
156	2021-08-10 to 2021-08-14	Tue – Sat	5	Joni Reicher (HR ER Sr. Director) Stella Low (Public Relations Director)	Stella Low (Public Relations Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director)	Email	2	<b>Re: Attorney client privileged - timing of Issue confirmation</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
157	2021-08-13 to 2021-08-14	Fri – Sat	2	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director)	Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director)	Email with attachment s	3	<b>Re: Confidential and Privileged: AG IMG_6329.PNG</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
158	2021-08-13 to 2021-08-14	Fri – Sat	2	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director)	Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director)	Email with attachment s	3	<b>Re: Confidential and Privileged: AG image0.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
159	2021-08-14 to 2021-08-15	Sat – Sun	2	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director)	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director)	Email	2	<b>Re: Employees/witnesses</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
160	2021-08-14 to 2021-08-15	Sat – Sun	2	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Kate Adams (General Counsel) Josh Rosenstock (Public Relations Sr. Dir.)	Kate Adams (General Counsel) Deirdre O'Brien (Sr. VP, HR) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Jen Waldo (HR VP) Joni Reicher (HR ER Sr. Director) Stella Low (Public Relations Director) Kristin Huguette Quayle (Pub. Rel. VP) Isela Perez (Legal, HR Mngr.) Rachel Tulley (Public Relations, Sr. Mngr.) Heidi Holter (HR Sr. Director. Comp.)	Email	3	<b>Re: ER update-privileged and confidential (AG)</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
161	2021-08-15	Sunday	1	Deirdre O'Brien (Sr. VP, HR) Joni Reicher (HR ER Sr. Director)	Joni Reicher (HR ER Sr. Director) Kate Adams (General Counsel) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Deirdre O'Brien (Sr. VP, HR)	Email with attachments	6	<b>Re: ATTORNEY CLIENT PRIVILEGED: Issue Confirmation</b>  <b>DRAFT talking points - AG EE Witnesses pages Confirmation of Issues copy v2 8.9.21.pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
162	2021-08-15	Sunday	1	Joni Reicher (HR ER Sr. Director) Kate Adams (General Counsel) Deirdre O'Brien (Sr. VP, HR)	Kate Adams (General Counsel) Deirdre O'Brien (Sr. VP, HR) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Email	2	<b>Re: ATTORNEY CLIENT PRIVILEGED: Issue Confirmation</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
163	2021-08-16	Monday	1	Joni Reicher (HR ER Sr. Director)	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Jen Waldo (HR VP) Joni Reicher (HR ER Sr. Director)	Calendar File	1	<b>ACP AG sync</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
164	2021-08-16	Monday	1	Debbie Rice (Legal Sr. Director, HR)	Kate Adams (General Counsel) Deirdre O'Brien (Sr. VP, HR) Jen Waldo (HR VP) Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator) Kristin Huguette Quayle (Pub. Rel. VP) Isela Perez (Legal, HR Mngr.)	Email	1	<b>AG issue confirmation/ready to send</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
165	2021-08-17	Tuesday	1	Adelmise Warner (HR ER Sr. Director)		Document	2	<b>Talking Points - PBPs and ER (8.16.21).pdf</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations, and the termination of Plaintiff's employment, performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
166	2021-08-17	Tuesday	1	Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	3	<b>Re: APPLE CONFIDENTIAL: Issue Confirmation</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
167	2021-08-17	Tuesday	1	Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Email	3	<b>Re: APPLE CONFIDENTIAL: Issue Confirmation</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
168	2021-08-17	Tuesday	1	Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Jessica Perry (Ext. Counsel - Orrick, Partner)	Email	4	<b>Re: ACP: Fwd: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
169	2021-08-16 to 2021-08-17	Mon – Tue	2	Joni Reicher (HR ER Sr. Director) Jenna Waibel (HR ER, Investigator)	Jenna Waibel (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Debra Rubenstein (EH&S Legal) Joni Reicher (HR ER Sr. Director)	Email	5	<b>Re: Privileged &amp; Confidential--meeting notes with AG from 7/7/2021</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
170	2021-08-16 to 2021-08-17	Mon – Tue	2	Jenna Waibel (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director)	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Debra Rubenstein (EH&S Legal) Jenna Waibel (HR ER, Investigator)	Email	5	<b>Re: Privileged &amp; Confidential--meeting notes with AG from 7/7/2021</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
171	2021-08-16 to 2021-08-17	Mon – Tue	2	Jenna Waibel (HR ER, Investigator) Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director)	Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Jenna Waibel (HR ER, Investigator) Carl Johnson (EH&S Program Mngr.) Elizabeth Schmidt (EH&S Director) Antone Jaine (EH&S Mngr.) Jenna Waibel (HR ER, Investigator)	Email	7	<b>Re: Privileged &amp; Confidential--meeting notes with AG from 7/7/2021</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
172	2021-08-16 to 2021-08-17	Mon – Tue	2	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Jenna Waibel (HR ER, Investigator) Joni Reicher (HR ER Sr. Director)	Jenna Waibel (HR ER, Investigator) Jenna Waibel (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Debra Rubenstein (EH&S Legal) Adelmise Warner (HR ER Sr. Director)	Email	5	<b>Re: Privileged &amp; Confidential--meeting notes with AG from 7/7/2021</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
173	2021-08-16 to 2021-08-17	Mon – Tue	2	Debra Rubenstein (EH&S Legal) Jenna Waibel (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director)	Jenna Waibel (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debra Rubenstein (EH&S Legal)	Email	6	<b>Re: Privileged &amp; Confidential--meeting notes with AG from 7/7/2021</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
174	2021-08-16	Monday	1	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Jenna Waibel (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Jenna Waibel (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Debra Rubenstein (EH&S Legal) Adelmise Warner (HR ER Sr. Director)	Email	4	<b>Re: Privileged &amp; Confidential--meeting notes with AG from 7/7/2021</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
175	2021-08-17	Tuesday	1	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email	4	<b>Re: APPLE CONFIDENTIAL: Issue Confirmation</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
176	2021-08-17	Tuesday	1	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR); Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director)	Email	3	<b>Re: APPLE CONFIDENTIAL: Issue Confirmation</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
177	2021-08-17	Tuesday	1	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director) Jessica Perry (Ext. Counsel - Orrick, Partner)	Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Jessica Perry (Ext. Counsel - Orrick, Partner)	Email	5	<b>Re: ACP: Response to AG's 8/16 email</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
178	2021-08-18	Wednesd ay	1	Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	5	<b>Re: APPLE CONFIDENTIAL: Issue Confirmation</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
179	2021-08-18	Wednesd ay	1	Jenna Waibel (HR ER, Investigator)	Elizabeth Schmidt (EH&S Director) Debra Rubenstein (EH&S Legal)	Email	4	<b>Meeting notes for 7/7/21 meeting with Ashley Gjovik</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of	
180	2021-08-18 to 2021-08-19	Wed – Thu	2	Ekelemchi Okpo (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR)	Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Email	2	<b>Re: ACP Data Request</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
181	2021-08-19 to 2021-08-20	Thu – Fri	2	Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	4	<b>Re: ACP - Fwd: Welcome and Prep Work   AU Race &amp; Justice</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
182	2021-08-20	Friday	1	Ekelemchi Okpo (HR ER, Investigator)	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Email with attachment s	3	<b>ACP: APPROVAL REQUEST: Backup Collection and Email/Communications Preservation Backup preserve.numbers</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
183	2021-08-19 to 2021-08-20	Thu – Fri	2	Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	4	<b>Re: ACP - Fwd: Welcome and Prep Work   AU Race &amp; Justice</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
184	2021-08-20	Friday	1	Ekelemchi Okpo (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.)	Email	4	<b>ACP Fwd: Welcome and Prep Work   AU Race &amp; Justice</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
185	2021-08-20	Friday	1	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	4	<b>Re: ;DRAFT REPLY Fwd: ACP: Fwd: Welcome and Prep Work   AU Race &amp; Justice</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
186	2021-08-20	Friday	1	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	5	<b>Re: ACP: Fwd: Welcome and Prep Work   AU Race &amp; Justice</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
187	2021-08-20	Friday	1	Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email	4	<b>Re: ACP: Fwd: Welcome and Prep Work   AU Race &amp; Justice</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
188	2021-08-14 to 2021-08-20	Sat – Fri	7	Joni Reicher (HR ER Sr. Director) Rachel Tulley (Public Relations, Sr. Mngr.) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Stella Low (Public Relations Director) Deirdre O'Brien (Sr. VP, HR) Josh Rosenstock (Public Relations Sr. Dir.)	Debbie Rice (Legal Sr. Director, HR) Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Adelmise Warner (HR ER Sr. Director) Stella Low (Public Relations Director) Josh Rosenstock (Public Relations Sr. Dir.) Kristin Huguet Quayle (Pub. Rel. VP) Jen Waldo (HR VP) Isela Perez (Legal, HR Mngr.) Rachel Tulley (Public Relations, Sr. Mngr.) <del>Joni Reicher (HR ER Sr. Director)</del> Joni Reicher (HR ER Sr. Director) Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Adelmise Warner (HR ER Sr. Director) Stella Low (Public Relations Director) Josh Rosenstock (Public Relations Sr. Dir.) Kristin Huguet Quayle (Pub. Rel. VP) Jen Waldo (HR VP) Isela Perez (Legal, HR Mngr.) Rachel Tulley (Public Relations, Sr. Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email with attachment s	7	<b>Fwd: ER update-privileged and confidential (AG issue confirmation/next steps)</b>  PastedGraphic-46.png	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
189	2021-08-14 to 2021-08-20	Sat – Fri	7	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Rachel Tulley (Public Relations, Sr. Mngr.) Adelmise Warner (HR ER Sr. Director) Stella Low (Public Relations Director) Deirdre O'Brien (Sr. VP, HR) Josh Rosenstock (Public Relations Sr. Dir.)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Adelmise Warner (HR ER Sr. Director) Stella Low (Public Relations Director) Josh Rosenstock (Public Relations Sr. Dir.) Kristin Huguet Quayle (Pub. Rel. VP) Jen Waldo (HR VP) Isela Perez (Legal, HR Mngr.) Rachel Tulley (Public Relations, Sr. Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email	6	<b>Re: ER update-privileged and confidential (AG issue confirmation/next steps)</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
190	2021-08-19 to 2021-08-20	Thu – Fri	2	Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Farah, Dori	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Jen Waldo (HR VP) Isela Perez (Legal, HR Mngr.)	Email	3	<b>Re: Privileged and Confidential - AG - PSQ Employee</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	



P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
191	2021-08-20 to 2021-08-21	Fri – Sat	2	Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email	5	<b>Re: ;DRAFT REPLY Fwd: ACP: Fwd: Welcome and Prep Work   AU Race &amp; Justice</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
192	2021-08-20 to 2021-08-21	Fri – Sat	2	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director)	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director)	Email	5	<b>Re: ;DRAFT REPLY Fwd: ACP: Fwd: Welcome and Prep Work   AU Race &amp; Justice</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
193	2021-08-20 to 2021-08-21	Fri – Sat	2	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director); Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Email	5	<b>Re: DRAFT REPLY Fwd: ACP: Fwd: Welcome and Prep Work   AU Race &amp; Justice</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
194	2021-08-21	Saturday	1	Debbie Rice (Legal Sr. Director, HR)	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.)	Email	1	<b>Response to AG-privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
195	2021-08-14 to 2021-08-22	Sat – Sun	9	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Rachel Tulley (Public Relations, Sr. Mngr.) Adelmise Warner (HR ER Sr. Director) Stella Low (Public Relations Director) Deirdre O'Brien (Sr. VP, HR) Josh Rosenstock (Public Relations Sr. Dir.)	Joni Reicher (HR ER Sr. Director) Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Adelmise Warner (HR ER Sr. Director) Stella Low (Public Relations Director) Josh Rosenstock (Public Relations Sr. Dir.) Kristin Huguet Quayle (Pub. Rel. VP) Jen Waldo (HR VP) Isela Perez (Legal, HR Mngr.) Rachel Tulley (Public Relations, Sr. Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email	8	<b>Re: ER update-privileged and confidential (AG issue confirmation/next steps)</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
196	2021-08-14 to 2021-08-22	Sat – Sun	9	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Rachel Tulley (Public Relations, Sr. Mngr.) Adelmise Warner (HR ER Sr. Director) Stella Low (Public Relations Director) Deirdre O'Brien (Sr. VP, HR) Josh Rosenstock (Public Relations Sr. Dir.)	Joni Reicher (HR ER Sr. Director) Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Adelmise Warner (HR ER Sr. Director) Stella Low (Public Relations Director) Josh Rosenstock (Public Relations Sr. Dir.) Kristin Huguet Quayle (Pub. Rel. VP) Jen Waldo (HR VP) Isela Perez (Legal, HR Mngr.) Rachel Tulley (Public Relations, Sr. Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email	7	<b>Re: ER update-privileged and confidential (AG issue confirmation/next steps)</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
197	2021-08-23	Monday	1	Jenna Waibel (HR ER, Investigator)		Document	11	<b>A. Gjovik Interview Notes.pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
198	2021-08-23	Monday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	6	<b>Helen Polkes - 8:23:21 Interview .pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
199	2021-08-23	Monday	1	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director); Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Email	5	<b>Re: ACP - Fwd: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
200	2021-08-23	Monday	1	Adelmise Warner (HR ER Sr. Director) Jenna Waibel (HR ER, Investigator)	Jenna Waibel (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email with attachments	23	<b>Re: Privileged &amp; Confidential--Fwd: Ashley Gjovik/Dan - 4/29 Meeting Notes</b>  <b>A. Gjovik Interview Notes.pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
201	2021-08-23	Monday	1	Ekelemchi Okpo (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.)	Email	4	ACP - Fwd: Welcome and Prep Work   AU Race & Justice	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
202	2021-08-23	Monday	1	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director)	Email	5	Re: ACP - Fwd: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
203	2021-08-23	Monday	1	Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director)	Email	6	Re: ACP JR Follow up questions Fwd: ACP - Fwd: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
204	2021-08-23	Monday	1	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director)	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator)	Email	1	Re: ACP AG Timeline	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
205	2021-08-24	Tuesday	1	Ekelemchi Okpo (HR ER, Investigator)		Spreadsheet	1	AG_INC080053657_Peer_Feedback.xlsx	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
206	2021-08-23 to 2021-08-24	Mon - Tue	2	Ekelemchi Okpo (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator)	Email	7	Re: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
207	2021-08-24	Tuesday	1	Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email	6	Re: ACP - Fwd: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
208	2021-08-24	Tuesday	1	Ekelemchi Okpo (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.)	Email with attachments	13	Fwd: APPLE CONFIDENTIAL: Issue Confirmation	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
209	2021-08-23 to 2021-08-24	Mon - Tue	2	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director)	Email	7	Re: Employee Relations Investigation: Ashley Gjovik's Issue Confirmation	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
210	2021-08-24 to 2021-08-25	Tue - Wed	2	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Jen Waldo (HR VP) Adelmise Warner (HR ER Sr. Director)	Email	5	Re: AG Historical Peer feedback for legal matter-privileged and confidential	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
211	2021-08-23 to 2021-08-25	Mon - Wed	3	Ekelemchi Okpo (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Jessica Perry (Ext. Counsel - Orrick, Partner)	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator) Lara Graham (Ext. Counsel - Orrick, Associate)	Email	2	Re: Gjovik - Chart of Witnesses and Claims	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
212	2021-08-26	Thursday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	10	Dan West - 8:26:21 Interview .pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
213	2021-08-14 to 2021-08-26	Sat – Thu	13	Kristin Huguét Quayle (Pub. Rel. VP) Jen Waldo (HR VP) Rachel Tulley (Public Relations, Sr. Mngr.) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Stella Low (Public Relations Director) Josh Rosenstock (Public Relations Sr. Dir.) Isela Perez (Legal, HR Mngr.) Josh Rosenstock (Public Relations Sr. Dir.) Deirdre O'Brien (Sr. VP, HR)	Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Jen Waldo (HR VP) Kym Marker-ok (HR VP) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Stella Low (Public Relations Director) Josh Rosenstock (Public Relations Sr. Dir.) Isela Perez (Legal, HR Mngr.) Rachel Tulley (Public Relations, Sr. Mngr.) Joni Reicher (HR ER Sr. Director) Kristina Raspe (Facilities VP) Kristin Huguét Quayle (Pub. Rel. VP)	Email with attachment s	13	<b>Re: ER update-privileged and confidential (AG issue confirmation/next steps)</b>  <b>PastedGraphic-2.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
214	2021-08-26	Thursday	1	Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Kristin Huguét Quayle (Pub. Rel. VP)	Tony DeMario (Global Security Mngr.) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Jen Waldo (HR VP) Joni Reicher (HR ER Sr. Director) Stella Low (Public Relations Director) Barbara Whye (HR VP) Dylan Loewe (Public Relations Director) Isaac Rubin (Public Relations, Writer)	Email	5	<b>Fwd: The Information - Apple Was the Most Secretive Company in Tech. Then it Developed a Slack Habit.</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
215	2021-08-26	Thursday	1	Jen Waldo (HR VP)	Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Kym Marker-ok (HR VP) Kristin Huguét Quayle (Pub. Rel. VP) Heidi Holder (HR, Comp. Sr. Director) Jen Waldo (HR VP)	Email	5	<b>ACP Slack Updates   08.26.21</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
216	2021-08-25 to 2021-08-26	Wed – Thu	2	Ekelemchi Okpo (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR) Jessica Perry (Ext. Counsel - Orrick, Partner)	Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator) Lara Graham (Ext. Counsel - Orrick, Associate)	Email with attachment s	4	<b>Re: Gjovik - Chart of Witnesses and Claims With Gjovik Revisions</b>  <b>Chart of Witnesses and Claims 4154-1082-1425 3.xlsx</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
217	2021-08-25 to 2021-08-26	Wed – Thu	2	Ekelemchi Okpo (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator)	Email	5	<b>Re: ACP - Draft Revised Issue Confirmation</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
218	2021-08-26	Thursday	1	Joni Reicher (HR ER Sr. Director)	Debbie Rice (Legal Sr. Director, HR)	Email with attachment s	3	<b>Draft ACP</b>  <b>Draft Exit Outcomes ACP.key</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
219	2021-08-27	Friday	1	Ekelemchi Okpo (HR ER, Investigator)	Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director)	Email	3	<b>ACP - Search Request</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
220	2021-08-27	Friday	1	Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	6	<b>Re: APPLE CONFIDENTIAL: Issue Confirmation</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
221	2021-08-26 to 2021-08-27	Thu – Fri	2	Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Email	4	<b>Re: ACP - Search Request</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	



P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
222	2021-08-16 to 2021-08-27	Mon – Fri	12	Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director); Debbie Rice (Legal Sr. Director, HR)	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.)	Email with attachments	8	<b>Re: Privileged and Confidential - AG Open Items (accommodations request)</b>  <b>Privileged and Confidential Gjovik</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the evaluation and response to plaintiffs workers compensation claims and accommodation requests, reflecting legal advice and strategy, and in	
223	2021-08-27 to 2021-08-28	Fri – Sat	2	Melissa Polinsky (Legal Director, Investigations) Debbie Rice (Legal Sr. Director, HR)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Melissa Polinsky (Legal Director, Investigations)	Email	4	<b>Re: [TIME SENSITIVE] Request for comment from The Verge</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
224	2021-08-28	Saturday	1	Melissa Polinsky (Legal Director, Investigations)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director)	Email	3	<b>Fwd: [TIME SENSITIVE] Request for comment from The Verge</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
225	2021-08-14 to 2021-08-29	Sat – Sun	16	Debbie Rice (Legal Sr. Director, HR) Kristin Huguet Quayle (Pub. Rel. VP) Jen Waldo (HR VP) Rachel Tulley (Public Relations, Sr. Mngr.) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Stella Low (Public Relations Director) Deirdre O'Brien (HR, Sr. VP) Josh Rosenstock (Public Relations Sr. Dir.)	Jessica Perry (Ext. Counsel - Orrick, Partner) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Kristin Huguet Quayle (Pub. Rel. VP) Deirdre O'Brien (HR, Sr. VP) Kate Adams (General Counsel) Jen Waldo (HR VP) Kym Marker-ok (HR VP) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Stella Low (Public Relations Director) Josh Rosenstock (Public Relations Sr. Dir.) Rachel Tulley (Public Relations, Sr. Mngr.) Joni Reicher (HR ER Sr. Director)	Email with attachments	42	<b>Re: Coverage Summary - employee issues on social and in media</b>  <b>Social Media and Online Communications   People.pdf</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
226	2021-08-30	Monday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	3	<b>Mike Ertell - 8:30:21 Interview .pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
227	2021-08-30	Monday	1	Jenna Waibel (HR ER, Investigator)	Antone Jaine (EH&S Mngr.) Carl Johnson (EH&S Program Mngr.) Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Robert Thomas (EH&S Mngr.)	Calendar File	1	<b>EHS/ AG Follow up sync</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
228	2021-08-14 to 2021-08-30	Sat – Mon	17	Jen Waldo (HR VP) Kristin Huguet Quayle (Pub. Rel. VP) Rachel Tulley (Public Relations, Sr. Mngr.) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Stella Low (Public Relations Director) Deirdre O'Brien (HR, Sr. VP) Josh Rosenstock (Public Relations Sr. Dir.)	Kristin Huguet Quayle (Pub. Rel. VP) Jen Waldo (HR VP) Deirdre O'Brien (HR, Sr. VP) Kate Adams (General Counsel) Kym Marker-ok (HR VP) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Stella Low (Public Relations Director) Josh Rosenstock (Public Relations Sr. Dir.) Isela Perez (Legal, HR Mngr.) Rachel Tulley (Public Relations, Sr. Mngr.) Joni Reicher (HR ER Sr. Director) Barbara Whve (HR VP)	Email with attachments	16	<b>Re: Coverage Summary - employee issues on social and in media</b>  <b>PastedGraphic-73.png</b>  <b>552c159b-b0c5-46fd-800e-8d8918926efc.png</b>  <b>PastedGraphic-6.png</b>  <b>PastedGraphic-76.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
229	2021-08-30	Monday	1	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Debbie Rice (Legal Sr. Director, HR) Kristin Huguet Quayle (Pub. Rel. VP) Fred Sainz (Public Relations Sr. Dir.) Joni Reicher (HR ER Sr. Director)	Email	6	<b>Re: Additional info re iCloud@Apple</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
230	2021-08-26 to 2021-08-30	Thu – Mon	5	Ekelemchi Okpo (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Email	5	<b>Re: ACP - Search Request</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
231	2021-08-30 to 2021-08-31	Mon – Tue	2	Jen Waldo (HR VP) Deirdre O'Brien (HR, Sr. VP) Eddie McLeod (HR, Talent Mobility)	Deirdre O'Brien (HR, Sr. VP) Jen Waldo (HR VP) Kate Adams (General Counsel) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Kristin Huguet Quayle (Pub. Rel. VP) Kym Marker-ok (HR VP) Adelmise Warner (HR ER Sr. Director) Jen Waldo (HR VP)	Email	8	Re: ACP Slack Updates   08.30.21	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
232	2021-08-30 to 2021-08-31	Mon – Tue	2	Kate Adams (General Counsel) Deirdre O'Brien (HR, Sr. VP) Jen Waldo (HR VP) Eddie McLeod (HR, Talent Mobility)	Deirdre O'Brien (Sr. VP, HR) Jen Waldo (HR VP) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Kristin Huguet Quayle (Pub. Rel. VP) Kym Marker-ok (HR VP) Adelmise Warner (HR ER Sr. Director)	Email	8	Re: ACP Slack Updates   08.30.21	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
233	2021-08-20 to 2021-08-31	Fri – Tue	12	Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Carl Johnson (EH&S Program Mngr.) Debra Rubenstein (EH&S Legal) Jenna Waibel (HR ER, Investigator) Antone Jaine (EH&S Mngr.) Robert Thomas (EH&S Mngr.) Antone Jaine (EH&S Mngr.)	Isela Perez (Legal, HR Mngr.) Carl Johnson (EH&S Program Mngr.) Debra Rubenstein (EH&S Legal) Jenna Waibel (HR ER, Investigator) Antone Jaine (EH&S Mngr.) Robert Thomas (EH&S Mngr.) Helen Polkes (HR Business Partner)	Email	6	Re: SD01 - upcoming EHS meeting w employee - [Privileged & Confidential-attorney work product]	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
234	2021-08-20 to 2021-08-31	Fri – Tue	12	Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner); Antone Jaine (EH&S Mngr.) Jenna Waibel (HR ER, Investigator) Isela Perez (Legal, HR Mngr.)	Helen Polkes (HR Business Partner) Carl Johnson (EH&S Program Mngr.) Robert Thomas (EH&S Mngr.) Antone Jaine (EH&S Mngr.) Antone Jaine (EH&S Mngr.) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Debra Rubenstein (EH&S Legal)	Email	5	Re: SD01 - upcoming EHS meeting w employee - [Privileged & Confidential-attorney work product]	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
235	2021-08-20 to 2021-08-31	Fri – Tue	12	Helen Polkes (HR Business Partner) Jenna Waibel (HR ER, Investigator) Debra Rubenstein (EH&S Legal) Antone Jaine (EH&S Mngr.) Isela Perez (Legal, HR Mngr.)	Jenna Waibel (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Antone Jaine (EH&S Mngr.) Robert Thomas (EH&S Mngr.) Carl Johnson (EH&S Program Mngr.) Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner)	Email	6	Re: SD01 - upcoming EHS meeting w employee - [Privileged & Confidential-attorney work product]	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
236	2021-08-31 to 2021-09-01	Tue – Wed	2	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Katheleen Emery (NO TITLE)	Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	2	Re: Ashley Gjovik. Case HRC000019497 (complaint re ear scan invitation)	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
237	2021-08-31 to 2021-09-01	Tue – Wed	2	Debbie Rice (Legal Sr. Director, HR) Katheleen Emery (NO TITLE)	Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email	3	Fwd: Ashley Gjovik. Case HRC000019497 (complaint re ear scan invitation)	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
238	2021-08-31 to 2021-09-01	Tue – Wed	2	Debbie Rice (Legal Sr. Director, HR) Katheleen Emery (NO TITLE)	Katheleen Emery (NO TITLE) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Email	1	Re: Ashley Gjovik. Case HRC000019497	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
239	2021-09-02	Thursday	1	Helen Polkes (HR Business Partner)	Antone Jaine (EH&S Mngr.) Carl Johnson (EH&S Program Mngr.) Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Robert Thomas (EH&S Mngr.)	Calendar File	1	EHS/ AG Follow up sync	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
240	2021-07-20 to 2021-09-02	Tue – Thu	45	Antone Jaine (EH&S Mngr.) Jenna Waibel (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Helen Polkes (HR Business Partner) Ekelemchi Okpo (HR ER, Investigator) Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal)	Jenna Waibel (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Debra Rubenstein (EH&S Legal) Helen Polkes (HR Business Partner) Ekelemchi Okpo (HR ER, Investigator) Antone Jaine (EH&S Mngr.) Carl Johnson (EH&S Program Mngr.) Robert Thomas (EH&S Mngr.)	Email	16	<b>Re: Privileged &amp; Confidential-Meeting notes from 7/7/21</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
241	2021-09-01 to 2021-09-02	Wed – Thu	2	Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director)	Email	3	<b>Re: Wiping of Device Qs related to A.G.</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
242	2021-09-01 to 2021-09-02	Wed – Thu	2	Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) John Ternus (Hardware Eng. Sr. VP)	Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Email	3	<b>Re: Internal application</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
243	2021-09-03	Friday	1	Jen Waldo (HR VP)	Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Kristin Huguette Quayle (Pub. Rel. VP) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Kym Marker-ok (HR VP) Barbara Whye (HR VP) Heidi Holter (HR - Comp. Sr. Director)	Email	12	<b>ACP Slack Updates   09.03.21</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
244	2021-09-03	Friday	1	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director)	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director) Kristin Huguette Quayle (Pub. Rel. VP) Jen Waldo (HR VP)	Email with attachment s	8	<b>Re: ACP - Fwd: Meeting Request</b> <b>PastedGraphic-1.png</b> <b>Screenshot 2021-09-03 at 2.58.06 PM.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
245	2021-09-03	Friday	1	Ekelemchi Okpo (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.)	Email with attachment s	5	<b>ACP - Fwd: Meeting Request</b> <b>PastedGraphic-1.png</b>	Attorney Client Privilege	Attorney-client privileged documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
246	2021-09-02 to 2021-09-03	Thu – Fri	2	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	3	<b>Re: ACP: Prep for AG Follow up</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
247	2021-09-02 to 2021-09-03	Thu – Fri	2	Ekelemchi Okpo (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director)	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator)	Email	2	<b>Re: ACP: Prep for AG Follow up</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
248	2021-09-02 to 2021-09-03	Thu – Fri	2	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Email	3	<b>Re: ACP: Prep for AG Follow up</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
249	2021-09-02 to 2021-09-03	Thu – Fri	2	Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Email	2	<b>Re: ACP: Prep for AG Follow up</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
250	2021-09-02 to 2021-09-03	Thu – Fri	2	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR)	Email	3	<b>Re: ACP: Prep for AG Follow up</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
251	2021-09-02 to 2021-09-03	Thu – Fri	2	Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR)	Email	2	<b>Re: ACP: Prep for AG Follow up</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
252	2021-09-07	Tuesday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	4	<b>ACP AG Investigation summary key issues .numbers</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
253	2021-09-03 to 2021-09-07	Fri – Tue	5	Adelmise Warner (HR ER Sr. Director); Joni Reicher (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	5	<b>Re: ACP - Fwd: Meeting Request</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
254	2021-09-07	Tuesday	1	Kate Adams (General Counsel) Josh Rosenstock (Public Relations Sr. Dir.)	Josh Rosenstock (Public Relations Sr. Dir.) Debbie Rice (Legal Sr. Director, HR) Deirdre O'Brien (Sr. VP, HR) Barbara Whye (HR VP) Stella Low (Public Relations Director) Joni Reicher (HR ER Sr. Director) Kristin Huguett Quayle (Pub. Rel. VP) Jen Waldo (HR VP) Kym Marker-ok (HR VP) Heidi Holter (HR - Comp. Sr. Director) Diego Acevedo (Legal, HR) Adelmise Warner (HR ER Sr. Director)	Email	2	<b>Re: CNBC segment and additional tweets</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
255	2021-09-01 to 2021-09-07	Wed – Tue	7	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Melissa Polinsky (Legal Director, Investigations) Isela Perez (Legal, HR Mngr.) John Ternus (Hardware Eng. Sr. VP)	Debbie Rice (Legal Sr. Director, HR) James Ferguson (HR, Empl. Rel. Director) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director) Megan Bowman (HR Director) John Ternus (Hardware Eng. Sr. VP) Melissa Polinsky (Legal Director, Investigations) Tony DeMario (Global Security Mngr.)	Email	5	<b>Re: (AG) Fwd: Internal application (Glimmer/Gobbler) privileged and confidential</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
256	2021-09-07 to 2021-09-08	Tue – Wed	2	Ekelemchi Okpo (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR) Jessica Perry (Ext. Counsel - Orrick, Partner)	Debbie Rice (Legal Sr. Director, HR) Jessica Perry (Ext. Counsel - Orrick) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator)	Email	4	<b>Re: Draft - Response to AG</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
257	2021-09-07 to 2021-09-08	Tue – Wed	2	Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	4	<b>Re: ACP - Fwd: Meeting Request</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
258	2021-09-07 to 2021-09-08	Tue – Wed	2	Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	5	<b>Re: Meeting Request</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
259	2021-09-08	Wednesday	1	Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director)	Katheleen Emery (NO TITLE) Adelmise Warner (HR ER Sr. Director); Debbie Rice (Legal Sr. Director, HR)	Email	1	<b>Re: Ashley Gjovik Case HRC000045789</b>	Attorney Client Privilege	Attorney-client privileged communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
260	2021-09-09	Thursday	1	Adelmise Warner (HR ER Sr. Director)	Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Jen Waldo (HR VP) Isela Perez (Legal, HR Mngr.)	Email	1	<b>Confidential and Privileged: AG</b>	Attorney Client Privilege	Attorney-client privileged communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	



P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
261	2021-09-09	Thursday	1		Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director) Aleks Kagramanov (Global Sec. - Investigations) Joni Reicher (HR ER Sr. Director)	Messages with attachment s	8	<b>Direct message Adelmise Rosemé Warner, Aleks Kagramanov and 2 others - 2021-09-09 (UTC).pdf</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations, performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and the termination of Plaintiff's employment, reflecting legal advice and	
262	2021-09-09	Thursday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	3	<b>ACP - Investigation Summary A. Gjovik.pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
263	2021-09-09	Thursday	1	Megan Bowman (HR Director)		Document	2	<b>Privileged and Confidential - AG Term Letter DRAFT.pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents prepared at the direction of legal counsel and reflecting attorney edits and mental impressions regarding the termination of Plaintiff's employment, and in	
264	2021-09-09	Thursday	1	Joni Reicher (HR ER Sr. Director)	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Deirdre O'Brien (Sr. VP, HR) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Jen Waldo (HR VP) Joni Reicher (HR ER Sr. Director) Kate Adams (General Counsel) Kristin Huguat Quayle (Pub. Rel. VP) Melissa Polinsky (Legal Director, Investigations) Sophi Jacobs (Global Sec. - Investigations)	Calendar File	2	<b>Attorney client privileged - AG</b>	Attorney Client Privilege	Attorney-client privileged communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
265	2021-07-20 to 2021-09-09	Tue - Thu	52	Jenna Waibel (HR ER, Investigator) Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Antone Jaine (EH&S Mngr.)	Debra Rubenstein (EH&S Legal) Isela Perez (Legal, HR Mngr.) Antone Jaine (EH&S Mngr.) Helen Polkes (HR Business Partner) Jenna Waibel (HR ER, Investigator)	Email	19	<b>Re: Privileged &amp; Confidential-Meeting notes from 7/7/21</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to	
266	2021-09-08 to 2021-09-09	Wed - Thu	2	Ekelemchi Okpo (HR ER, Investigator) Adelmise Warner (HR ER Sr. Director)	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator)	Email	2	<b>Re: ACP - 9/8/21 draft response</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
267	2021-09-08 to 2021-09-09	Wed - Thu	2	Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director)	Email	4	<b>Re: ACP - 9/8/21 draft response</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
268	2021-09-09	Thursday	1	Joni Reicher (HR ER Sr. Director)	Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Adelmise Warner (HR ER Sr. Director) Jen Waldo (HR VP) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email with attachment s	2	<b>ACP Investigation findings</b> <b>ACP AG Executive Summary Keynote (9.9.21 Debrief).key</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
269	2021-09-09	Thursday	1	Aleks Kagramanov (Global Sec. - Investigations)	Deirdre O'Brien (Sr. VP, HR) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.)	Email with attachment s	6	<b>Re: AG Emails</b> <b>Screen Shot 2021-09-09 at 3.56.31 PM.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
270	2021-09-09	Thursday	1	Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator)	Ekelemchi Okpo (HR ER, Investigator) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email	6	<b>Re: Meeting Request</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
271	2021-09-09	Thursday	1	Isela Perez (Legal, HR Mngr.) Yannick Bertolus (Prod. Integrity VP) Jen Waldo (HR VP)	Yannick Bertolus (Prod. Integrity VP) Megan Bowman (HR Director) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Jen Waldo (HR VP) Isela Perez (Legal, HR Mngr.)	Email with attachment s	5	<b>Re: Attorney Client Privileged   Term Letter</b> <b>Privileged and Confidential - AG Term Letter DRAFT.pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
272	2021-09-09	Thursday	1	Aleks Kagramanov (Global Sec. - Investigations)	Tony DeMario (Global Security Mngr) Sophi Jacobs (Global Sec. - Investigations)	Email with attachment s	2	<b>AG Intro Email Draft</b>  <b>AG Intro Email-pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
273	2021-09-07 to 2021-09-09	Tue – Thu	3	Aleks Kagramanov (Global Sec. - Investigations) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Melissa Polinsky (Legal Director, Investigations) Debbie Rice (Legal Sr. Director, HR) Sophi Jacobs (Global Sec. - Investigations) Aleks Kagramanov (Global Sec. - Investigations)	Email with attachment s	20	<b>Re: (AG) Fwd: Internal application (Glimmer/Gobbler) privileged and confidential</b>  <b>AG Talking Points.pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
274	2021-09-09	Thursday	1	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.)	Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Jen Waldo (HR VP) Joni Reicher (HR ER Sr. Director)	Email	2	<b>Re: ACP AG Security reach out</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
275	2021-09-08 to 2021-09-09	Wed – Thu	2	Joni Reicher (HR ER Sr. Director)	Sophi Jacobs (Global Sec. - Investigations) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR)	Email	1	<b>Re: ACP meeting tomorrow</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
276	2021-09-09	Thursday	1	Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.)	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Jen Waldo (HR VP) Debbie Rice (Legal Sr. Director, HR)	Email	2	<b>Re: ACP AG Security reach out</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
277	2021-09-09	Thursday	1	Adelmise Warner (HR ER Sr. Director) Sophi Jacobs (Global Sec. - Investigations)	Sophi Jacobs (Global Sec. - Investigations) Aleks Kagramanov (Global Sec. - Investigations) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director)	Email with attachment s	3	<b>Re: Confidential and Privileged</b>  <b>utf-8"Ashley%20Gj%C3%B8vik.vcf</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
278	2021-09-09	Thursday	1	Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Yannick Bertolus (PI VP); Jen Waldo (HR VP)	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Yannick Bertolus (PI VP) Jen Waldo (HR VP)	Email	2	<b>Re: Attorney Client Privileged   Term Letter</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.	
279	2021-09-08 to 2021-09-09	Wed – Thu	2	Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Ekelemchi Okpo (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR)	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator)	Email	4	<b>Re: ACP - 9/8/21 draft response</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
280	2021-09-08 to 2021-09-09	Wed – Thu	2	Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator)	Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator)	Email	4	<b>Re: ACP - 9/8/21 draft response</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
281	2021-09-09	Thursday	1	Melissa Polinsky (Legal Director, Investigations)	Joni Reicher (HR ER Sr. Director)	Email	1	<b>AG call</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
282	2021-09-10	Friday	1	Josh Rosenstock (Public Relations Sr. Dir.)	Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Stella Low (Public Relations Director) Kristin Huguette Quayle (Pub. Rel. VP) Debbie Rice (Legal Sr. Director, HR) Jen Waldo (HR VP) Kym Marker-ok (HR VP) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Barbara Whye (HR VP) Rachel Tulley (Public Relations, Sr. Mngr.) Wolf	Email with attachment s	3	Coverage Summary - Fri Sept 10 - employee issues PastedGraphic-3.png	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
283	2021-09-09 to 2021-09-10	Thu - Fri	2	Christoph Jenkinson (Finance - Director) Joni Reicher (HR ER Sr. Director) Donna Ford (Payroll)	Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director) Christoph Jenkinson (Finance - Director)	Email	4	Re: ACP Final pay request	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.	
284	2021-09-09	Thursday	1	Joni Reicher (HR ER Sr. Director);	Adelmise Warner (HR ER Sr. Director) Jen Waldo (HR VP) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR)	Email with attachment s	6	ACP Action items DRAFT working document ACP AG Actions 9.9.21.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
285	2021-09-10	Friday	1	Jen Waldo (HR, VP)	Deirdre O'Brien (Sr. VP, HR) Kate Adams (General Counsel) Kristin Huguette Quayle (Pub. Rel. VP) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Kym Marker-ok (HR VP) Barbara Whye (HR VP) Jen Waldo (HR VP)	Email	9	ACP Slack & Twitter Updates   09.10.21 - 3 pm	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
286	2021-09-10	Friday	1	Jen Waldo (HR, VP)	Kate Adams (General Counsel) Deirdre O'Brien (Sr. VP, HR) Kristin Huguette Quayle (Pub. Rel. VP) Joni Reicher (HR ER Sr. Director) Adelmise Warner (HR ER Sr. Director) Kym Marker-ok (HR VP) Barbara Whye (HR VP) Debbie Rice (Legal Sr. Director, HR) Jen Waldo (HR VP)	Email	4	ACP Slack & Twitter Updates   @ 8AM PST 09.10.21	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding media coverage responses to inquiries and articles reflecting legal advice and strategy, and in anticipation of litigation.	
287	2021-09-10	Friday	1	Adelmise Warner (HR ER Sr. Director) Megan Bowman (HR Director) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Jen Waldo (HR VP) Yannick Bertolus (Product Integrity VP)	Megan Bowman (HR Director) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Jen Waldo (HR VP) Isela Perez (Legal, HR Mngr.)	Email	3	ATTORNEY CLIENT PRIVILEGED Re: Employment Status	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.	
288	2021-09-10	Friday	1	Adelmise Warner (HR ER Sr. Director)	Jen Waldo (HR VP) Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Email with attachment s	3	Confidential and Privileged: AG IMG_7033.PNG image0.png	Attorney Client Privilege	Attorney-client privileged communications prepared by employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal	
289	2021-09-10	Friday	1	Isela Perez (Legal, HR Mngr.) Joni Reicher (HR ER Sr. Director)	Joni Reicher (HR ER Sr. Director) Megan Bowman (HR Director) Adelmise Warner (HR ER Sr. Director) Jen Waldo (HR VP) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.)	Email with attachment s	3	Re: ACP - Summary and final termination letter and attachments GSE AG Summary to Yannick 9.9.21 Final.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.	
290	2021-09-10	Friday	1	Joni Reicher (HR ER Sr. Director)	Isela Perez (Legal, HR Mngr.) Adelmise Warner (HR ER Sr. Director)	Email with attachment s	1	Final termination letter pdf and pages and Enclosures with the termination letter	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.	



P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Page s	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
291	2021-09-09 to 2021-09-10	Thu – Fri	2	Sophi Jacobs (Global Sec. - Investigations) Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Sue Carroll (Legal - Trademark/Copyright)	Adelmise Warner (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.) Debbie Rice (Legal Sr. Director, HR) Joni Reicher (HR ER Sr. Director) Sophi Jacobs (Legal - Investigations) Sue Carroll (Legal - Trademark/Copyright)	Email with attachment s	5	<b>Re: Twitter TOUs [CD035452] Privileged &amp; Confidential</b>  <b>Image from iOS.png</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications prepared by legal counsel and/or employees acting under the direction and supervision of legal counsel regarding the investigation and handling of Plaintiffs unauthorized disclosure of confidential information performed at the direction of legal counsel for the purposes of informing legal advice to Defendant, and in anticipation of litigation.	
292	2021-09-09 to 2021-09-10	Thu – Fri	2	Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.); Sophi Jacobs (Global Sec. - Investigations)	Isela Perez (Legal, HR Mngr.) Megan Bowman (HR Director) Joni Reicher (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR); Tony DeMario (Global Security Mngr.)	Email	1	<b>Re: Privileged -- AG System Access</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the termination of Plaintiff's employment reflecting legal advice and strategy, and in anticipation of litigation.	
293	2021-09-12	Sunday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	13	<b>Summary of Allegations &amp; Coaching .key</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
294	2021-09-12	Sunday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	5	<b>ACP AG Executive Summary Keynote (9.9.21 Debrief) HW shared copy.key</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
295	2021-09-12	Sunday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	12	<b>ACP Software Engineering Summary Keynote (9.10.21 Debrief) shared copy.key</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
296	2021-09-13	Monday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	25	<b>ACP HWE and SWE Summary 9.14.21.key</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
297	2021-09-14	Tuesday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	24	<b>ACP HWE and SWE Summary 9.14.21 Version 7:30AMTUES.key</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
298	2021-09-16	Thursday	1	Antone Jaine (EH&S Mngr.)	Antone Jaine (EH&S Mngr.) Debra Rubenstein (EH&S Legal) Elizabeth Schmidt (EH&S Director) Helen Polkes (HR Business Partner) Isela Perez (Legal, HR Mngr.) Jenna Waibel (HR ER, Investigator) Kyle Matarrese (Legal, HR) Robert Thomas (EH&S Mngr)	Calendar File	1	<b>SD01 EHS comms</b>	Attorney Client Privilege	Attorney-client privileged communications between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation, response and handling of Plaintiffs inquiries and allegations into Environmental Health & Safety issues performed at the direction of legal counsel for the purposes of informing legal advice to Defendant.	
299	2021-09-17	Friday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	23	<b>ACP - Investigation Summary A. Gjovik - Draft .pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
300	2021-09-24	Friday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	1	<b>Closeout plan .pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
301	2021-09-27	Monday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	15	<b>ACP - Investigation Summary A. Gjovik - Draft copy .pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
302	2021-09-27	Monday	1	Debbie Rice (Legal Sr. Director, HR)	Adelmise Warner (HR ER Sr. Director) Debbie Rice (Legal Sr. Director, HR) Ekelemchi Okpo (HR ER, Investigator) Isela Perez (Legal, HR Mngr.) Jessica Perry (Ext. Counsel - Orrick,	Calendar File	1	<b>AG final investigation report discussion</b>	Attorney Client Privilege	Attorney-client privileged communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
303	2021-09-29	Wednesday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	1	<b>SWE Witness List .pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
304	2021-09-29	Wednesday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	15	<b>ACP - Investigation Summary A. Gjovik - Draft copy 2 .pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	
305	2021-10-01	Friday	1	Adelmise Warner (HR ER Sr. Director)	Jessica Perry (Ext. Counsel - Orrick, Partner) Debbie Rice (Legal Sr. Director, HR) Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator)	Email with attachment s	17	<b>Confidential and Attorney-Client Privileged: Draft Investigation Summary (AG) ACP - Investigation Summary A. Gjovik - Draft copy 2 .pages</b>	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents and communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of litigation.	

P.L. No.	Date(s)	[DOW]	[Range]	Author(s) or Sender(s)	Recipient(s) / Participant(s)	Category	Pages	Description (e.g. Titles/Subjects Represented)	Protection Asserted	Subject Matter / Basis for Protection	Bates No.
306	2021-10-05	Tuesday	1	Jessica Perry (Ext. Counsel - Orrick)		Document	16	Gjovik - Redlined Investigation Summary A. Gjovik - Draft copy 2.docx (JP Edits).pdf	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
307	2021-10-08	Friday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	15	ACP - Investigation Summary A. Gjovik - Draft copy 3.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
308	2021-10-10	Sunday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	22	Investigation Summary Exhibits.key	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
309	2021-10-10	Sunday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	15	ACP - Investigation Summary A. Gjovik_September 2021 W:Comments.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
310	2021-10-10	Sunday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	15	ACP - Investigation Summary A. Gjovik_September 2021 .pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
311	2021-10-11	Monday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	15	ACP - Investigation Summary A. Gjovik_September 2021 .pdf	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
312	2021-10-12	Tuesday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	11	Powers - 8:25:21 Interview copy.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	
313	2021-09-29 to 2021-10-12	Wed - Tue	14	Isela Perez (Legal, HR Mngr.) Ekelemchi Okpo (HR ER, Investigator); Adelmise Warner (HR ER Sr. Director)	Ekelemchi Okpo (HR ER, Investigator) Debbie Rice (Legal Sr. Director, HR) Adelmise Warner (HR ER Sr. Director) Joni Reicher (HR ER Sr. Director) Isela Perez (Legal, HR Mngr.)	Email	5	Re: ACP: Investigation Summary	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected communications sent between legal counsel and employees acting under the direction and supervision of legal counsel regarding the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in	
314	2021-10-27	Wednesday	1	Ekelemchi Okpo (HR ER, Investigator)		Document	1	ACP AG Investigation Timeline 9.1.21.pages	Attorney Client Privilege Attorney Work Product	Attorney-client privileged and work-product protected documents reflecting the investigation of Plaintiffs claims and allegations by Apple Employee Relations performed at the direction of legal counsel for the purpose of informing legal advice to Defendant, and in anticipation of	